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EPA		POTENTIAL HAZARDOUS WASTE SITE SITE INSPECTION REPORT PART 1 - SITE LOCATION AND INSPECTION INFORMATION		I. IDENTIFICATION	
II. SITE NAME AND LOCATION		01 STATE		02 SITE NUMBER	
01 SITE NAME (Legal, common, or descriptive name of site) * SPECTRUM PRINTING		02 STREET, ROUTE NO., OR SPECIFIC LOCATION IDENTIFIER * 4132 U.S. HIGHWAY 278			
03 CITY COVINGTON		04 STATE GA	05 ZIP CODE 30209	06 COUNTY NEWTON	07 COUNTY CODE 08 CONG DIST
09 COORDINATES * LATITUDE 33 36 15. LONGITUDE -83 32 03.		10 TYPE OF OWNERSHIP (Check one) <input type="checkbox"/> A. PRIVATE <input type="checkbox"/> B. FEDERAL <input checked="" type="checkbox"/> C. STATE <input type="checkbox"/> D. COUNTY <input type="checkbox"/> E. MUNICIPAL <input type="checkbox"/> F. OTHER TRUSTEESHIP <input type="checkbox"/> G. UNKNOWN			
III. INSPECTION INFORMATION					
01 DATE OF INSPECTION * 8 24 87 MONTH DAY YEAR		02 SITE STATUS * <input type="checkbox"/> ACTIVE <input checked="" type="checkbox"/> INACTIVE		03 YEARS OF OPERATION BEGINNING YEAR 1 ENDING YEAR X UNKNOWN	
04 AGENCY PERFORMING INSPECTION (Check all that apply) <input type="checkbox"/> A. EPA <input checked="" type="checkbox"/> B. EPA CONTRACTOR ROY F. WESTON (Name of firm) <input type="checkbox"/> C. MUNICIPAL <input type="checkbox"/> D. MUNICIPAL CONTRACTOR (Name of firm) <input type="checkbox"/> E. STATE <input type="checkbox"/> F. STATE CONTRACTOR (Name of firm) <input type="checkbox"/> G. OTHER (Specify)					
05 CHIEF INSPECTOR JOHN ASHLEY BROWN		06 TITLE CIVIL ENGINEER		07 ORGANIZATION ROY F. WESTON	
08 TELEPHONE NO. (404) 352 4147		09 OTHER INSPECTORS W. Klütz		10 TITLE EPA OSC	
11 ORGANIZATION EPA		12 TELEPHONE NO. (404) 347 3931			
13 SITE REPRESENTATIVES INTERVIEWED		14 TITLE		15 ADDRESS	
16 TELEPHONE NO. ()					
17 ACCESS GAINED BY (Check one) <input checked="" type="checkbox"/> PERMISSION <input type="checkbox"/> WARRANT		18 TIME OF INSPECTION 0900		19 WEATHER CONDITIONS CLEAR, WARM	
IV. INFORMATION AVAILABLE FROM					
01 CONTACT RAMONA J. KLEIN		02 OF (Agency/Organization) GEORGIA DEPT OF NATURAL RES.		03 TELEPHONE NO. (404) 656-2836	
04 PERSON RESPONSIBLE FOR SITE INSPECTION FORM JOHN ASHLEY BROWN		05 AGENCY EPA-TAT	06 ORGANIZATION ROY F. WESTON	07 TELEPHONE NO. (404) 352 4147	08 DATE 8 24 87 MONTH DAY YEAR



POTENTIAL HAZARDOUS WASTE SITE
SITE INSPECTION REPORT
PART 3 - DESCRIPTION OF HAZARDOUS CONDITIONS AND INCIDENTS

I. IDENTIFICATION
01 STATE 02 SITE NUMBER
GA W0299

II. HAZARDOUS CONDITIONS AND INCIDENTS

01 ☒ A. GROUNDWATER CONTAMINATION SOUTH OF
03 POPULATION POTENTIALLY AFFECTED: CONNINGTON 02 ☐ OBSERVED (DATE: 8-24-87) ☒ POTENTIAL ☐ ALLEGED
04 NARRATIVE DESCRIPTION
RAIN RUNOFF FROM OPEN DRUMS AND SPILLED MATERIAL ON SITE MOST LIKELY
WILL RUN INTO DRIED INDIAN CREEK WHICH IS A DRAINAGE PATH WHICH TRAVELS
SOUTH AND DRIES UP DURING PERIODS OF LITTLE RAINFALL.

01 ☒ B. SURFACE WATER CONTAMINATION SOUTH OF
03 POPULATION POTENTIALLY AFFECTED: CONNINGTON 02 ☐ OBSERVED (DATE: 8-24-87) ☒ POTENTIAL ☐ ALLEGED
04 NARRATIVE DESCRIPTION
RAIN RUNOFF FROM OPEN DRUMS AND SPILLED MATERIAL ON SITE WILL
MOST LIKELY MAKE ITS WAY TO DRIED INDIAN CREEK

01 ☒ C. CONTAMINATION OF AIR 02 ☐ OBSERVED (DATE: 8-24-87) ☒ POTENTIAL ☐ ALLEGED
03 POPULATION POTENTIALLY AFFECTED: CONNINGTON 04 NARRATIVE DESCRIPTION
EVAPORATION OF SOLVENTS (CARRIERS) IN OPEN DRUMS

01 ☐ D. FIRE EXPLOSIVE CONDITIONS 02 ☐ OBSERVED (DATE:) ☐ POTENTIAL ☐ ALLEGED
03 POPULATION POTENTIALLY AFFECTED: 04 NARRATIVE DESCRIPTION

01 ☒ E. DIRECT CONTACT 02 ☐ OBSERVED (DATE: 8-24-87) ☒ POTENTIAL ☐ ALLEGED
03 POPULATION POTENTIALLY AFFECTED: CONNINGTON 04 NARRATIVE DESCRIPTION
MATERIAL IN OPEN DRUMS IS EASILY ACCESSIBLE TO PUBLIC

01 ☒ F. CONTAMINATION OF SOIL 02 ☐ OBSERVED (DATE: 8-24-87) ☐ POTENTIAL ☒ ALLEGED
03 AREA POTENTIALLY AFFECTED: <0.1 (Acres) 04 NARRATIVE DESCRIPTION
SPILLAGE OF MATERIAL ON THE GROUND WAS OBSERVED BENEATH
THE TERMINUS OF A PIPE GOING INTO THE SPECTRUM PRINTING BUILDING

01 ☐ G. DRINKING WATER CONTAMINATION 02 ☐ OBSERVED (DATE:) ☐ POTENTIAL ☐ ALLEGED
03 POPULATION POTENTIALLY AFFECTED: 04 NARRATIVE DESCRIPTION

01 ☒ H. WORKER EXPOSURE/INJURY 02 ☐ OBSERVED (DATE: 8-24-87) ☒ POTENTIAL ☐ ALLEGED
03 WORKERS POTENTIALLY AFFECTED: 04 NARRATIVE DESCRIPTION
IN THE EVENT OF ACCIDENT CARE SHOULD BE EXERCISED AS MANY OF
THE PALLETS DRUMS ARE STACKED ON APPEAR UNSOUND

01 ☐ I. POPULATION EXPOSURE/INJURY 02 ☐ OBSERVED (DATE:) ☐ POTENTIAL ☐ ALLEGED
03 POPULATION POTENTIALLY AFFECTED: 04 NARRATIVE DESCRIPTION



POTENTIAL HAZARDOUS WASTE SITE
SITE INSPECTION
PART 4 - PERMIT AND DESCRIPTIVE INFORMATION

I. IDENTIFICATION
01 STATE GA 02 SITE NUMBER W0299

II. PERMIT INFORMATION

01 TYPE OF PERMIT ISSUED (Check all that apply)	02 PERMIT NUMBER	03 DATE ISSUED	04 EXPIRATION DATE	05 COMMENTS
<input type="checkbox"/> A. NPDES				
<input type="checkbox"/> B. UIC				
<input type="checkbox"/> C. AIR				
<input type="checkbox"/> D. RCRA				
<input type="checkbox"/> E. RCRA INTERIM STATUS				
<input type="checkbox"/> F. SPCC PLAN				
<input type="checkbox"/> G. STATE (Specify)				
<input type="checkbox"/> H. LOCAL (Specify)				
<input type="checkbox"/> I. OTHER (Specify)				
<input type="checkbox"/> J. NONE				

III. SITE DESCRIPTION

01 STORAGE/ DISPOSAL (Check all that apply)	02 AMOUNT	03 UNIT OF MEASURE	04 TREATMENT (Check all that apply)	05 OTHER
<input type="checkbox"/> A. SURFACE IMPOUNDMENT			<input type="checkbox"/> A. INCINERATION	<input checked="" type="checkbox"/> A. BUILDINGS ON SITE
<input type="checkbox"/> B. PILES			<input type="checkbox"/> B. UNDERGROUND INJECTION	<u>1</u>
<input checked="" type="checkbox"/> C. DRUMS, ABOVE GROUND	<u>APPROX 275</u>	<u>55 GAL</u>	<input type="checkbox"/> C. CHEMICAL/PHYSICAL	
<input type="checkbox"/> D. TANK, ABOVE GROUND			<input type="checkbox"/> D. BIOLOGICAL	
<input type="checkbox"/> E. TANK, BELOW GROUND			<input type="checkbox"/> E. WASTE OIL PROCESSING	
<input type="checkbox"/> F. LANDFILL			<input type="checkbox"/> F. SOLVENT RECOVERY	
<input type="checkbox"/> G. LANDFARM			<input type="checkbox"/> G. OTHER RECYCLING/RECOVERY	
<input type="checkbox"/> H. OPEN DUMP			<input type="checkbox"/> H. OTHER (Specify)	
<input type="checkbox"/> I. OTHER (Specify)				

07 COMMENTS

IV. CONTAINMENT

01 CONTAINMENT OF WASTES (Check one)

☐ A. ADEQUATE, SECURE ☐ B. MODERATE ☐ C. INADEQUATE, POOR ☒ D. INSECURE, UNSOUND, DANGEROUS

02 DESCRIPTION OF DRUMS, DIKING, LINERS, BARRIERS, ETC.

V. ACCESSIBILITY

01 WASTE EASILY ACCESSIBLE: ☒ YES ☐ NO

02 COMMENTS

VI. SOURCES OF INFORMATION (Cite specific references, e.g., state files, sample analysis, reports)



POTENTIAL HAZARDOUS WASTE SITE
SITE INSPECTION REPORT
PART 5 - WATER, DEMOGRAPHIC, AND ENVIRONMENTAL DATA

I. IDENTIFICATION
01 STATE 02 SITE NUMBER
GA WO299

VI. ENVIRONMENTAL INFORMATION

01 PERMEABILITY OF UNSATURATED ZONE (Check one)

☐ A. $10^{-8} - 10^{-6}$ cm/sec ☐ B. $10^{-4} - 10^{-6}$ cm/sec ☐ C. $10^{-4} - 10^{-3}$ cm/sec ☐ D. GREATER THAN 10^{-3} cm/sec

02 PERMEABILITY OF BEDROCK (Check one)

☐ A. IMPERMEABLE (Less than 10^{-6} cm/sec) ☐ B. RELATIVELY IMPERMEABLE ($10^{-6} - 10^{-8}$ cm/sec) ☐ C. RELATIVELY PERMEABLE ($10^{-2} - 10^{-4}$ cm/sec) ☐ D. VERY PERMEABLE (Greater than 10^{-2} cm/sec)

03 DEPTH TO BEDROCK

_____ (ft)

04 DEPTH OF CONTAMINATED SOIL ZONE

_____ (ft)

05 SOIL pH

06 NET PRECIPITATION

_____ (in)

07 ONE YEAR 24 HOUR RAINFALL

_____ (in)

08 SLOPE
SITE SLOPE

DIRECTION OF SITE SLOPE

TERRAIN AVERAGE SLOPE

_____ %

_____ %

09 FLOOD POTENTIAL

SITE IS IN _____ YEAR FLOODPLAIN

10

☐ SITE IS ON BARRIER ISLAND, COASTAL HIGH HAZARD AREA, RIVERINE FLOODWAY

11 DISTANCE TO WETLANDS (5 acre minimum)

ESTUARINE

OTHER

A. _____ (mi)

B. _____ (mi)

12 DISTANCE TO CRITICAL HABITAT (of endangered species)

_____ (mi)

ENDANGERED SPECIES: _____

13 LAND USE IN VICINITY

DISTANCE TO:

COMMERCIAL/INDUSTRIAL

RESIDENTIAL AREAS; NATIONAL/STATE PARKS,
FORESTS, OR WILDLIFE RESERVES

AGRICULTURAL LANDS
PRIME AG LAND AG LAND

A. 40.1 (mi)

B. _____ (mi)

C. _____ (mi)

D. _____ (mi)

14 DESCRIPTION OF SITE IN RELATION TO SURROUNDING TOPOGRAPHY

TERRAIN IS SLIGHTLY HILLY. THE SITE IS LOCATED
ON THE PLATEAU OF A MEDIUM-SIZED HILL

VII. SOURCES OF INFORMATION (Cite specific references, e.g., State files, sample analysis, reports)

USGS TOPO MAP



POTENTIAL HAZARDOUS WASTE SITE
SITE INSPECTION REPORT
PART 7 - OWNER INFORMATION

I. IDENTIFICATION

01 STATE 02 SITE NUMBER
GA W0299

II. CURRENT OWNER(S)

PARENT COMPANY (If applicable)

01 NAME RICHARD ELLENBURG (TRUSTEE)		02 D+B NUMBER		08 NAME		09 D+B NUMBER	
03 STREET ADDRESS (P.O. Box, RFD #, etc.) 83 WALTON ST NW		04 SIC CODE		10 STREET ADDRESS (P.O. Box, RFD #, etc.)		11 SIC CODE	
05 CITY ATLANTA		06 STATE GA	07 ZIP CODE 30318	12 CITY		13 STATE	14 ZIP CODE
01 NAME		02 D+B NUMBER		08 NAME		09 D+B NUMBER	
03 STREET ADDRESS (P.O. Box, RFD #, etc.)		04 SIC CODE		10 STREET ADDRESS (P.O. Box, RFD #, etc.)		11 SIC CODE	
05 CITY		06 STATE	07 ZIP CODE	12 CITY		13 STATE	14 ZIP CODE
01 NAME		02 D+B NUMBER		08 NAME		09 D+B NUMBER	
03 STREET ADDRESS (P.O. Box, RFD #, etc.)		04 SIC CODE		10 STREET ADDRESS (P.O. Box, RFD #, etc.)		11 SIC CODE	
05 CITY		06 STATE	07 ZIP CODE	12 CITY		13 STATE	14 ZIP CODE
01 NAME		02 D+B NUMBER		08 NAME		09 D+B NUMBER	
03 STREET ADDRESS (P.O. Box, RFD #, etc.)		04 SIC CODE		10 STREET ADDRESS (P.O. Box, RFD #, etc.)		11 SIC CODE	
05 CITY		06 STATE	07 ZIP CODE	12 CITY		13 STATE	14 ZIP CODE

III. PREVIOUS OWNER(S) (List most recent first)

IV. REALTY OWNER(S) (If applicable: list most recent first)

01 NAME RALPH PREDDY		02 D+B NUMBER		01 NAME		02 D+B NUMBER	
03 STREET ADDRESS (P.O. Box, RFD #, etc.) UNKNOWN		04 SIC CODE		03 STREET ADDRESS (P.O. Box, RFD #, etc.)		04 SIC CODE	
05 CITY		06 STATE	07 ZIP CODE	05 CITY		06 STATE	07 ZIP CODE
01 NAME		02 D+B NUMBER		01 NAME		02 D+B NUMBER	
03 STREET ADDRESS (P.O. Box, RFD #, etc.)		04 SIC CODE		03 STREET ADDRESS (P.O. Box, RFD #, etc.)		04 SIC CODE	
05 CITY		06 STATE	07 ZIP CODE	05 CITY		06 STATE	07 ZIP CODE
01 NAME		02 D+B NUMBER		01 NAME		02 D+B NUMBER	
03 STREET ADDRESS (P.O. Box, RFD #, etc.)		04 SIC CODE		03 STREET ADDRESS (P.O. Box, RFD #, etc.)		04 SIC CODE	
05 CITY		06 STATE	07 ZIP CODE	05 CITY		06 STATE	07 ZIP CODE

V. SOURCES OF INFORMATION (Cite specific references, e.g., state files, sample analysis, reports)



POTENTIAL HAZARDOUS WASTE SITE
SITE INSPECTION REPORT
PART 9 - GENERATOR/TRANSPORTER INFORMATION

I. IDENTIFICATION

01 STATE 02 SITE NUMBER

GA WD 299

II. ON-SITE GENERATOR

01 NAME	02 D+B NUMBER
03 STREET ADDRESS (P.O. Box, RFD #, etc.)	04 SIC CODE
05 CITY	06 STATE 07 ZIP CODE

III. OFF-SITE GENERATOR(S)

01 NAME	02 D+B NUMBER	01 NAME	02 D+B NUMBER
03 STREET ADDRESS (P.O. Box, RFD #, etc.)	04 SIC CODE	03 STREET ADDRESS (P.O. Box, RFD #, etc.)	04 SIC CODE
05 CITY	06 STATE 07 ZIP CODE	05 CITY	06 STATE 07 ZIP CODE
01 NAME	02 D+B NUMBER	01 NAME	02 D+B NUMBER
03 STREET ADDRESS (P.O. Box, RFD #, etc.)	04 SIC CODE	03 STREET ADDRESS (P.O. Box, RFD #, etc.)	04 SIC CODE
05 CITY	06 STATE 07 ZIP CODE	05 CITY	06 STATE 07 ZIP CODE

IV. TRANSPORTER(S)

01 NAME	02 D+B NUMBER	01 NAME	02 D+B NUMBER
03 STREET ADDRESS (P.O. Box, RFD #, etc.)	04 SIC CODE	03 STREET ADDRESS (P.O. Box, RFD #, etc.)	04 SIC CODE
05 CITY	06 STATE 07 ZIP CODE	05 CITY	06 STATE 07 ZIP CODE
01 NAME	02 D+B NUMBER	01 NAME	02 D+B NUMBER
03 STREET ADDRESS (P.O. Box, RFD #, etc.)	04 SIC CODE	03 STREET ADDRESS (P.O. Box, RFD #, etc.)	04 SIC CODE
05 CITY	06 STATE 07 ZIP CODE	05 CITY	06 STATE 07 ZIP CODE

V. SOURCES OF INFORMATION (Case specific references, e.g., state files, sample analysis reports)

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POTENTIAL HAZARDOUS WASTE SITE
SITE INSPECTION REPORT
PART 10 - PAST RESPONSE ACTIVITIES

I. IDENTIFICATION

01 STATE 02 SITE NUMBER

GA WO 299

II. PAST RESPONSE ACTIVITIES (Continued)

01 ☐ R. BARRIER WALLS CONSTRUCTED
04 DESCRIPTION

02 DATE

03 AGENCY

01 ☐ S. CAPPING/COVERING
04 DESCRIPTION

02 DATE

03 AGENCY

01 ☐ T. BULK TANKAGE REPAIRED
04 DESCRIPTION

02 DATE

03 AGENCY

01 ☐ U. GROUT CURTAIN CONSTRUCTED
04 DESCRIPTION

02 DATE

03 AGENCY

01 ☐ V. BOTTOM SEALED
04 DESCRIPTION

02 DATE

03 AGENCY

01 ☐ W. GAS CONTROL
04 DESCRIPTION

02 DATE

03 AGENCY

01 ☐ X. FIRE CONTROL
04 DESCRIPTION

02 DATE

03 AGENCY

01 ☐ Y. LEACHATE TREATMENT
04 DESCRIPTION

02 DATE

03 AGENCY

01 ☐ Z. AREA EVACUATED
04 DESCRIPTION

02 DATE

03 AGENCY

01 ☐ 1. ACCESS TO SITE RESTRICTED
04 DESCRIPTION

02 DATE

03 AGENCY

01 ☐ 2. POPULATION RELOCATED
04 DESCRIPTION

02 DATE

03 AGENCY

01 ☒ 3. OTHER REMEDIAL ACTIVITIES
04 DESCRIPTION

02 DATE 8-24-87

03 AGENCY CITY OF COVINGTON

BARRIER TAPE PUT IN PLACE

III. SOURCES OF INFORMATION (Cite specific references e.g., state files, sample analysis, reports)



POTENTIAL HAZARDOUS WASTE SITE
PRELIMINARY ASSESSMENT
PART 1 - SITE INFORMATION AND ASSESSMENT

I. IDENTIFICATION
01 STATE 02 SITE NUMBER
GA W0299

II. SITE NAME AND LOCATION

01 SITE NAME (Legal, common, or descriptive name of site) SPECTRUM PRINTING		02 STREET, ROUTE NO., OR SPECIFIC LOCATION IDENTIFIER 4132 U.S. HIGHWAY 278			
03 CITY COVINGTON	04 STATE GA	05 ZIP CODE 30209	06 COUNTY NEWTON		07 COUNTY CODE 08 CONG DIST
09 COORDINATES LATITUDE 33 36 15		LONGITUDE 83 52 03			

10 DIRECTIONS TO SITE (Starting from nearest public road)
FROM ATLANTA TAKE INTERSTATE 20 EAST APPROXIMATELY 35 MILES TO THE COVINGTON U.S. 278 EXIT. TAKE U.S. 278 EAST APPROX 1 MILE TO WEST STREET GO LEFT APPROX 100 FEET SITE IS ON THE RIGHT

III. RESPONSIBLE PARTIES

01 OWNER (if known) RICHARD ELLENBURG (TRUSTEE)		02 STREET (Business, mailing, residential) 83 WALTON ST NW			
03 CITY ATLANTA	04 STATE GA	05 ZIP CODE 30318	06 TELEPHONE NUMBER (404) 525 4000		
07 OPERATOR (if known and different from owner)		08 STREET (Business, mailing, residential)			
09 CITY	10 STATE	11 ZIP CODE	12 TELEPHONE NUMBER ()		

13 TYPE OF OWNERSHIP (Check one)
☐ A. PRIVATE ☐ B. FEDERAL: _____ (Agency name)
☒ F. OTHER: TRUSTEESHIP - RICHARD ELLENBURG (Specify)
☐ C. STATE ☐ D. COUNTY ☐ E. MUNICIPAL
☐ G. UNKNOWN

14 OWNER/OPERATOR NOTIFICATION ON FILE (Check all that apply)
☐ A. RCRA 3001 DATE RECEIVED: _____ MONTH DAY YEAR ☐ B. UNCONTROLLED WASTE SITE (RCRA 103 d) DATE RECEIVED: _____ MONTH DAY YEAR ☐ C. NONE

IV. CHARACTERIZATION OF POTENTIAL HAZARD

01 ON SITE INSPECTION <input checked="" type="checkbox"/> YES DATE 8 24 87 MONTH DAY YEAR <input type="checkbox"/> NO		BY (Check all that apply) <input checked="" type="checkbox"/> A. EPA <input checked="" type="checkbox"/> B. EPA CONTRACTOR <input checked="" type="checkbox"/> C. STATE <input type="checkbox"/> D. OTHER CONTRACTOR <input type="checkbox"/> E. LOCAL HEALTH OFFICIAL <input type="checkbox"/> F. OTHER: _____ (Specify) CONTRACTOR NAME(S): ROY F. WESTON			
02 SITE STATUS (Check one) <input type="checkbox"/> A. ACTIVE <input checked="" type="checkbox"/> B. INACTIVE <input type="checkbox"/> C. UNKNOWN		03 YEARS OF OPERATION BEGINNING YEAR _____ ENDING YEAR _____ <input checked="" type="checkbox"/> UNKNOWN			

04 DESCRIPTION OF SUBSTANCES POSSIBLY PRESENT, KNOWN, OR ALLEGED
CHROMIUM, LEAD, XYLENES, ANHYDROUS ISOPROPYL ALCOHOL

05 DESCRIPTION OF POTENTIAL HAZARD TO ENVIRONMENT AND/OR POPULATION

PRINTING WASTES WERE OBSERVED ON THE GROUND AND ON THE PAVED AREA WHERE DRUMS ARE STAGED

V. PRIORITY ASSESSMENT

01 PRIORITY FOR INSPECTION (Check one. If high or medium is checked, complete Part 2 - Waste Information and Part 3 - Description of Hazardous Conditions and Incident(s))
☐ A. HIGH (Inspection required promptly) ☒ B. MEDIUM (Inspection required) ☐ C. LOW (Inspect on time available basis) ☐ D. NONE (No further action needed; complete current disposition form)

VI. INFORMATION AVAILABLE FROM

01 CONTACT RAMONA J. KLEIN	02 OF (Agency/Organization) GA DEPT OF NATURAL RESOURCES		03 TELEPHONE NUMBER (404) 636 2836	
04 PERSON RESPONSIBLE FOR ASSESSMENT JOHN ASHLEY BROWN	05 AGENCY EPA-TA7	06 ORGANIZATION ROY F. WESTON	07 TELEPHONE NUMBER (404) 552 9147	08 DATE 9 29 87 MONTH DAY YEAR



POTENTIAL HAZARDOUS WASTE SITE
PRELIMINARY ASSESSMENT
PART 3 - DESCRIPTION OF HAZARDOUS CONDITIONS AND INCIDENTS

I. IDENTIFICATION
01 STATE 02 SITE NUMBER
GA W0299

II. HAZARDOUS CONDITIONS AND INCIDENTS

01 ☒ A. GROUNDWATER CONTAMINATION SOUTH OF 02 ☐ OBSERVED (DATE: 8-24-87) ☒ POTENTIAL ☐ ALLEGED
03 POPULATION POTENTIALLY AFFECTED: COWINGTON 04 NARRATIVE DESCRIPTION

RAIN RUNOFF FROM OPEN DRUMS AND SPILLED MATERIAL ON SITE MOST LIKELY
WILL RUN INTO DRIED INDIAN CREEK WHICH IS A DRAINAGE PATH WHICH TRAVELS
SOUTH AND DRIES UP DURING PERIODS OF LITTLE RAIN

01 ☐ B. SURFACE WATER CONTAMINATION SOUTH OF 02 ☐ OBSERVED (DATE: 8-24-87) ☒ POTENTIAL ☐ ALLEGED
03 POPULATION POTENTIALLY AFFECTED: COWINGTON 04 NARRATIVE DESCRIPTION

RAIN RUNOFF FROM OPEN DRUMS AND SPILLED MATERIAL ON SITE WILL
MOST LIKELY MAKE ITS WAY TO DRIED INDIAN CREEK

01 ☒ C. CONTAMINATION OF AIR 02 ☐ OBSERVED (DATE: 8-24-87) ☒ POTENTIAL ☐ ALLEGED
03 POPULATION POTENTIALLY AFFECTED: COWINGTON 04 NARRATIVE DESCRIPTION

EVAPORATION OF SOLVENTS (CARRIERS) IN OPEN DRUMS

01 ☐ D. FIRE/EXPLOSIVE CONDITIONS 02 ☐ OBSERVED (DATE:) ☐ POTENTIAL ☐ ALLEGED
03 POPULATION POTENTIALLY AFFECTED: 04 NARRATIVE DESCRIPTION

01 ☒ E. DIRECT CONTACT 02 ☐ OBSERVED (DATE: 8-24-87) ☒ POTENTIAL ☐ ALLEGED
03 POPULATION POTENTIALLY AFFECTED: 04 NARRATIVE DESCRIPTION

MATERIAL IN OPEN DRUMS IS EASILY ACCESSIBLE TO PUBLIC

01 ☒ F. CONTAMINATION OF SOIL 02 ☐ OBSERVED (DATE: 8-24-87) ☐ POTENTIAL ☒ ALLEGED
03 AREA POTENTIALLY AFFECTED: 0.1 (Acres) 04 NARRATIVE DESCRIPTION

SPILLAGE OF MATERIAL ON THE GROUND WAS OBSERVED BENEATH
THE TERMINUS OF A PIPE GOING INTO THE BUILDING

01 ☐ G. DRINKING WATER CONTAMINATION 02 ☐ OBSERVED (DATE:) ☐ POTENTIAL ☐ ALLEGED
03 POPULATION POTENTIALLY AFFECTED: 04 NARRATIVE DESCRIPTION

01 ☒ H. WORKER EXPOSURE/INJURY 02 ☐ OBSERVED (DATE: 8-24-87) ☒ POTENTIAL ☐ ALLEGED
03 WORKERS POTENTIALLY AFFECTED: 04 NARRATIVE DESCRIPTION

IN THE EVENT OF A CLEANUP CARE SHOULD BE EXERCISED AS MANY OF
THE PALLETS DRUMS ARE STAKED ON TO APPEAR UNSOUND

01 ☐ I. POPULATION EXPOSURE/INJURY 02 ☐ OBSERVED (DATE:) ☐ POTENTIAL ☐ ALLEGED
03 POPULATION POTENTIALLY AFFECTED: 04 NARRATIVE DESCRIPTION



POTENTIAL HAZARDOUS WASTE SITE
PRELIMINARY ASSESSMENT
PART 3 - DESCRIPTION OF HAZARDOUS CONDITIONS AND INCIDENTS

I. IDENTIFICATION
01 STATE 02 SITE NUMBER
GA W0299

II. HAZARDOUS CONDITIONS AND INCIDENTS (Continued)

01 ☐ J. DAMAGE TO FLORA
04 NARRATIVE DESCRIPTION

02 ☐ OBSERVED (DATE: _____)

☐ POTENTIAL

☐ ALLEGED

01 ☐ K. DAMAGE TO FAUNA
04 NARRATIVE DESCRIPTION (include name(s) of species)

02 ☐ OBSERVED (DATE: _____)

☐ POTENTIAL

☐ ALLEGED

01 ☐ L. CONTAMINATION OF FOOD CHAIN
04 NARRATIVE DESCRIPTION

02 ☐ OBSERVED (DATE: _____)

☐ POTENTIAL

☐ ALLEGED

01 ☒ M. UNSTABLE CONTAINMENT OF WASTES
(Spills/runoff, standing liquids/leaking drums)

02 ☐ OBSERVED (DATE: 8-24-87)

☐ POTENTIAL

☒ ALLEGED

03 POPULATION POTENTIALLY AFFECTED: COVINGTON

04 NARRATIVE DESCRIPTION

MANY DRUMS ARE OPEN AND FILLED TO THE TOP WITH RAIN WATER, SOME DRUMS ARE OVERTURNED AND LEAKING MATERIAL

01 ☐ N. DAMAGE TO OFFSITE PROPERTY
04 NARRATIVE DESCRIPTION

02 ☐ OBSERVED (DATE: _____)

☐ POTENTIAL

☐ ALLEGED

01 ☒ O. CONTAMINATION OF SEWERS, STORM DRAINS, WWTPs
04 NARRATIVE DESCRIPTION

02 ☐ OBSERVED (DATE: 8-24-87)

☐ POTENTIAL

☒ ALLEGED

RAIN RUNOFF FROM SITE WILL BE CARRIED BY STORM DRAINS

01 ☐ P. ILLEGAL/UNAUTHORIZED DUMPING
04 NARRATIVE DESCRIPTION

02 ☐ OBSERVED (DATE: _____)

☐ POTENTIAL

☐ ALLEGED

05 DESCRIPTION OF ANY OTHER KNOWN, POTENTIAL, OR ALLEGED HAZARDS

III. TOTAL POPULATION POTENTIALLY AFFECTED: _____

IV. COMMENTS

V. SOURCES OF INFORMATION (Cite specific references, e. g., State files, sample analysis, reports)

RAMONA J. KLEIN - STATE DEPT OF NAT RESOURCES, COVINGTON NEWS - FORMER OWNER PRIOR TO PRP'S ACQUISITION, RANDY BROWN - SOUTHEASTERN LABS, RANDY BROWN - SOUTHEASTERN LABS, DEWY STRICKLAND - CITY OF COVINGTON WATER WORKS, DON FLOYD - FIRE MARSHALL - COVINGTON, FRANK TURNER - COVINGTON CITY MANAGER

TABLE OF CONTENTS

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- III. DISCUSSION OF SAMPLING ACTIVITIES
- IV. METHODOLOGY AND QUALITY CONTROL
- V. DISCUSSION OF ANALYTICAL RESULTS

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TABLES

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I. INTRODUCTION

The Region IV Technical Assistance Team (TAT) of Roy F. Weston, Inc. conducted an investigation and assessment of the Spectrum Printing Site between the 5th and 24th of August 1987. The investigation performed by J. A. Brown (project officer), J. C. Lan and J. Lathram was conducted at the request of the U. S. EPA Region IV in accordance with the provisions of Technical Direction Document (TDD) 04-8708-03.

Bill Klutz, Region IV EPA, and Ramona Klein of the Georgia Department of Natural Resources also participated in the investigation.

The purpose of this investigation is to document a release to the environment of a hazardous substance, pollutant or contaminant as mandated by Section 104(e) of the Comprehensive Environmental Response Compensation and Liability Act (CERCLA) as amended by the Superfund Amendments and Reauthorization Act of 1986 (SARA).

II. SITE CHARACTERIZATION

A. Site Location

The site described herein as Spectrum Printing is located in Covington Georgia's commercial district at 4132 U.S. Highway 278. The coordinates of the site are latitude 33 degrees 36 minutes and 15 seconds and longitude 83 degrees 52 minutes and 3 seconds. The approximately 275 drums of interest are stockpiled on a paved area behind a medium sized industrial building formerly known as Spectrum Printing. A public road is contiguous to this paved area and from the road open drums containing printing process and waste materials are observable and accessible.

B. History and Waste Disposal Practices

From January 1987 until May 1987, the building at 4132 U.S. Highway 278 in Covington, Georgia was used as a printing company called Spectrum Printing. Spectrum Printing's owner Ralph Preddy filed for bankruptcy in May of 1987. Prior to January 1987, the building was used for the printing of a newspaper, The Covington News. The property is now in the trusteeship of The Law Firm of Richard Ellenburg of Atlanta.

There is no physical barrier to prevent access to the material in question and open drums are within 15 feet of a road (Annex C - Photographs). Additionally,

overturned and leaking drums have released their contents onto the paved area where they are staged. Discharged material was observed on the soil beneath the terminus of a pipe going into the building.

Since environmental releases of suspect compounds were observed on the site, the statutory authority of the Environmental Response, Compensation and Liability Act (CERCLA) was invoked in the form of sampling and analysis of substances involved to aid in determining if an immediate response is necessary to protect the public health and welfare and the environment.

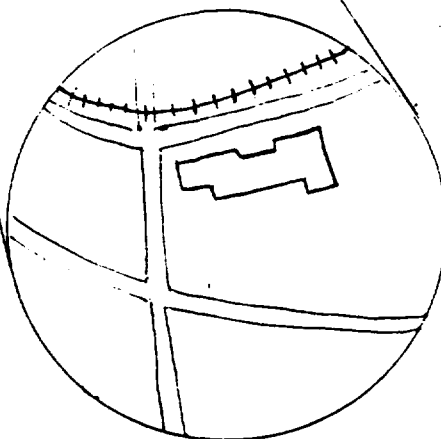
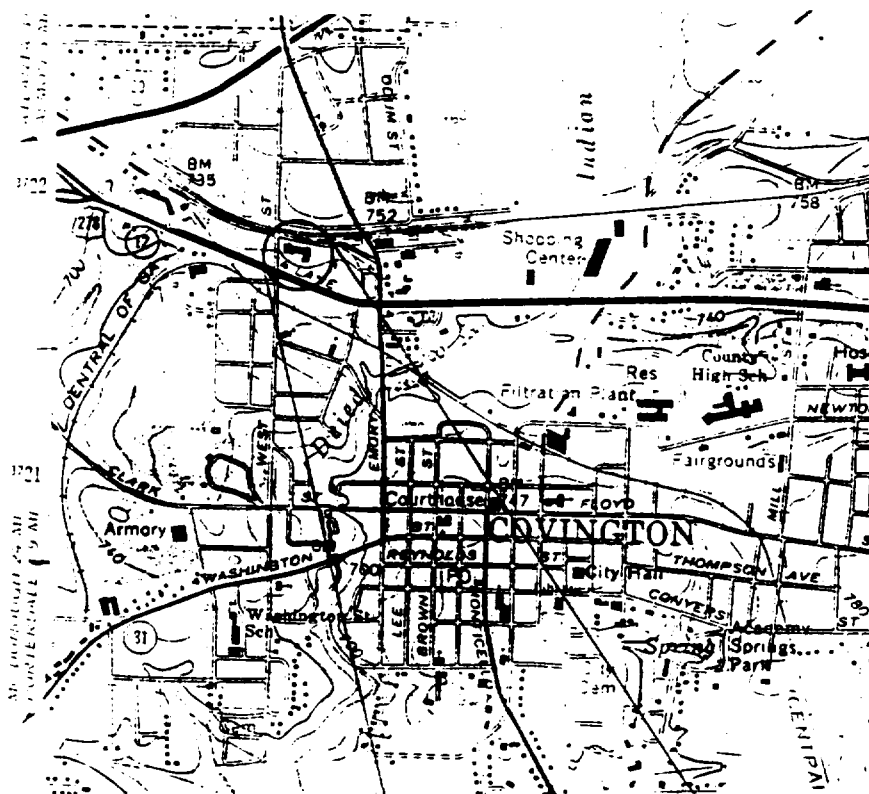
C. Potential for Migration of Wastes Offsite

Since the wastes in question are located on a paved surface in a municipal area, migration of contaminated rain runoff from the spillage and drums will be accelerated by the relatively impervious paved surfaces it is traveling on until it reaches a receiving stream. In this case the receiving stream would be dried Indian Creek which flows south.

The city of Covington's water filtration plant is located within seven tenths of a mile (0.7) east of the Spectrum Printing site. The plant has a reservoir which is recharged with water piped from the Alcovy River which is several miles north of Covington. Since the flow of the likely drainage path for the site flows south and the filtration plant receives its water from several miles north, the chance of contamination of the city's water supply from the Spectrum Printing site is minimal.

III. DISCUSSION OF SAMPLING ACTIVITIES

During the conduct of this investigation five composite samples of drummed and spilled material from the Spectrum Printing site were obtained and analyzed. The five composite samples were obtained as follows: two were from open drums containing black tarry material, one was composited from drums containing relatively pure red ink, one was composited from material spilled on the paved drum staging area and one was a composite of contaminated soil from an area around the terminus of a pipe going into the building (Figure 2 - Sampling Locations). Table I presents the sample codes, description of sample types, composite aliquots and analytical parameters. Laboratory analysis results are presented in Annex A and Quality Assurance/Quality Control Data for the laboratory analysis is presented in Annex B.



TITLE: FIGURE 1 SITE LOCATION MAP

MAP: _____

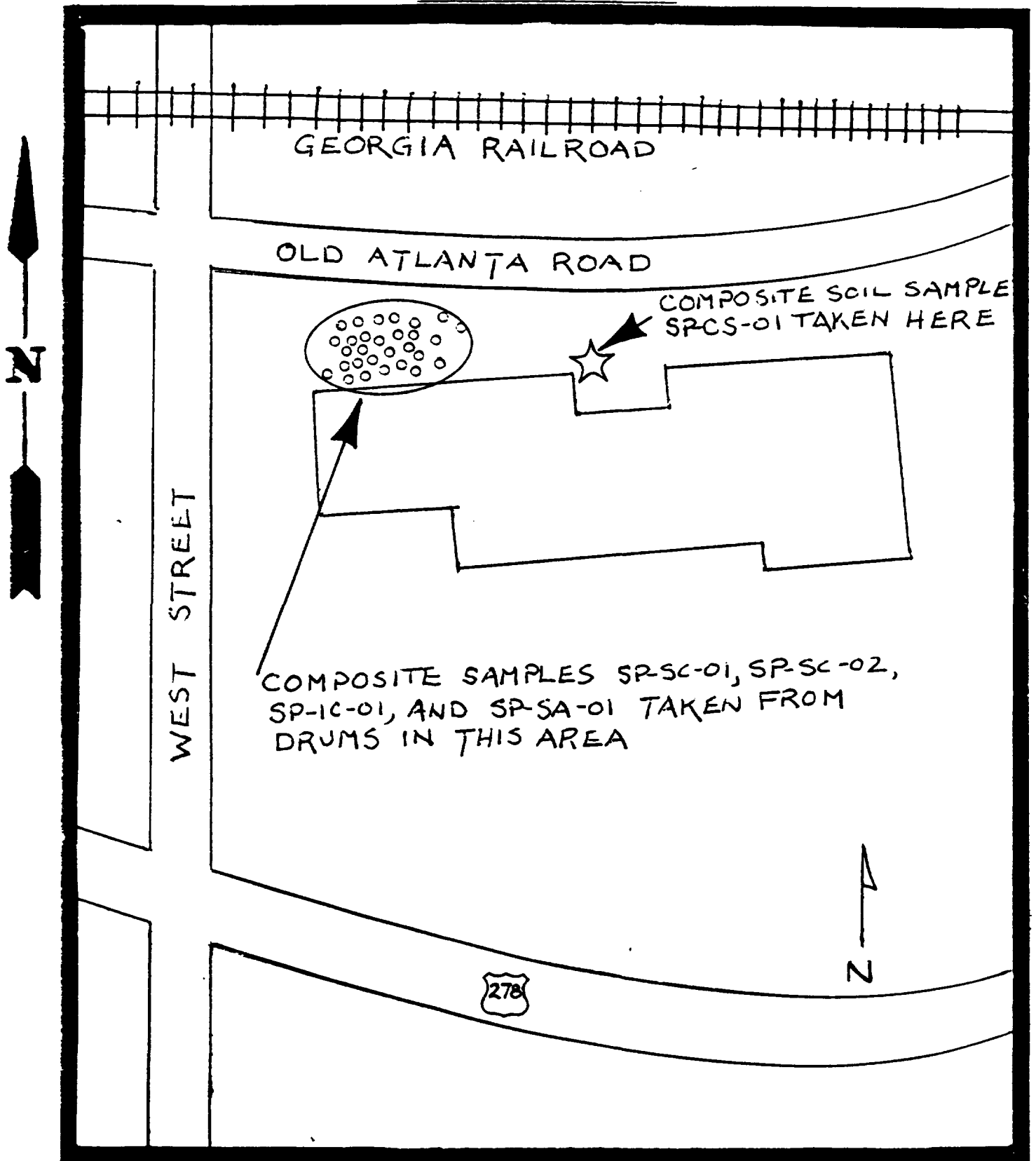
LOCATION: SPECTRUM PRINTING SITE,

SCALE: NONE

COVINGTON, GEORGIA

ORIGINATOR: _____

DATE: _____ TOD: _____



TITLE: FIGURE 2 SITE MAP SHOWING

SAMPLE LOCATIONS

MAP: _____

SCALE: NONE

LOCATION: SPECTRUM PRINTING SITE,

COVINGTON, GEORGIA

ORIGINATOR: _____

DATE: _____ TDD: _____

IV. METHODOLOGY AND QUALITY CONTROL

A. Methodology

All sample collections, sample preservation and chain of custody procedures used during this investigation were in accordance with the Environmental Services Division (ESD) procedures for field sampling and the sampling plan prepared under TDD #04-8708-03-1225.

Volatile organic analysis of the samples was performed by Southeast Laboratories in Atlanta using EPA methods 8010 and 8020 as set forth in EPA test methods for Evaluating Solid Wastes SW 846, 2nd edition revised 1985.

Analysis for priority pollutant metals was performed by Southeast Laboratories of Atlanta using the applicable methods set forth in EPA Methods for Evaluating Solid Waste; SW 846, 3rd edition November 1986.

B. Quality Control

Quality Control of the lab data presented in this report was performed by Southeast Laboratories and was in accordance with the Quality Control procedures specified in the EPA methods used.

Recovery rates for spikes were within the ranges specified in the EPA methods used. Contamination levels revealed by blanks were shown to be insignificant.

V. DISCUSSION OF ANALYTICAL RESULTS

Analysis for metals showed that sample SP-SC-01 had 14.8 ppm chromium and 8.3 ppm lead; sample SP-SC-02 had 9.1 ppm chromium and 12.7 ppm lead.

Volatile organic analysis of samples revealed the following levels of xylenes: SP-SC-01 26.1 ppm, SP-SC-02 88.3ppm, SP-IC-01 14.6 ppm, SP-SA-01 1.36 ppm, SP-CS-01 <50 ppb.

TABLE I
SAMPLE DESCRIPTIONS

Sample Code	Description	Composite Aliquots *	Analytical Parameter
SP-SC-01	Composite of sludgy materials from several drums	01, 02, 03, 04, 05	Metals VOA
SP-SC-02	Composite of sludgy materials from several drums	01, 02, 03, 04, 05	Metals VOA
SP-IC-01	Composite of red inks from several drums	01, 02, 03 04	VOA
SP-SA-01	Composite of material spilled on paved area	several locations on paved area	VOA
SP-CS-01	Composite of soil sample from area around the terminus of a pipe going into the building	Composite soil	VOA

* Where aliquots are designated by numbers these numbers represent individual drums from which the samples were taken.

ANNEX A

Results of Laboratory Analysis



- SINCE 1971

1490 Mecaslin Sr., N.W. Atlanta, Ga. 30309 (404) 873-1896 (404) 873-1880

SEPTEMBER 10, 1987

LABORATORY REPORT

WESTON SPER
100 ATLANTA TECHNOLOGY CENTER
SUITE 120, BLDG. 100
1575 NORTHSIDE DRIVE, N. W.
ATLANTA, GEORGIA 30318

REPORT NO. 25083

ATTN: MR. HARRY M. JONES/ASHLEY BROWN

SAMPLE MARKING: SPSC01 8-24-87, 0950.

TEST PROCEDURE: EPA TEST METHODS FOR EVALUATING SOLID WASTE,
NOVEMBER 1986, SW-846, 3RD ED., TESTED ON
PERKIN-ELMER 460 AND 1100 ATOMIC ABSORPTION
SPECTROPHOTOMETER.

RESULTS

	<u>MG/KG</u>
ARSENIC-----	<0.50
BERYLLIUM-----	<3
CADMIUM-----	<3
CHROMIUM-----	14.8
COPPER-----	270
LEAD-----	8.3
MERCURY-----	<0.05
NICKEL-----	<5
SELENIUM-----	<0.50
SILVER-----	<10
THALLIUM-----	<25
ZINC-----	7.3
CYANIDE-----	2.5

NOTE: TEST PROCEDURES ENCLOSED.

RESPECTFULLY SUBMITTED,

SOUTHEAST LABORATORIES, INC.

Randy Brown

RANDY BROWN

RB:MS



- SINCE 1971

1490 Mecoslin St. N.W. Atlanta, Ga. 30309-404-873-1896-404-873-1842

SEPTEMBER 10, 1987

LABORATORY REPORT

WESTON SPER
100 ATLANTA TECHNOLOGY CENTER
SUITE 120, BLDG. 100
1575 NORTHSIDE DRIVE, N. W.
ATLANTA, GEORGIA 30318
ATTN: MR. ASHLEY BROWN

REPORT NO. 25083-1

SAMPLE MARKING: SPSC 01-02,03,04,05, 8-24-87 0950.

TEST PROCEDURE: HALOGENATED AND AROMATIC VOLATILE ORGANICS BY EPA
METHODS 8010 AND 8020 AS SET FORTH IN TEST METHODS FOR EVALUATING
SOLID WASTE SW-846, 2ND EDITION REVISED 1985.

RESULTS

<u>MICROGRAM/KILOGRAM</u> (PPB)		<u>MICROGRAM/KILOGRAM</u> (PPB)	
BROMODICHLOROMETHANE	<5	METHYLENE CHLORIDE	13
BROMOFORM	<5	TETRACHLOROETHENE	<5
BROMOMETHANE	<5	1,1,1 TRICHLOROETHANE	<5
CARBON TETRACHLORIDE	<5	1,1,2 TRICHLOROETHANE	<5
CHLOROBENZENE	<5	TRICHLOROETHENE	<5
CHLOROETHANE	<5	TRICHLOROFLUOROMETHANE	<5
2-CHLOROETHYL VINYL ETHER	<5	VINYL CHLORIDE	<5
CHLOROFORM	<5		
CHLOROMETHANE	<5	BENZENE	179
DIBROMOCHLOROMETHANE	<5	TOLUENE	241
1,2 DICHLOROBENZENE	<5	ETHYLBENZENE	<50
1,3 DICHLOROBENZENE	<5	XYLENES	26,100
1,4 DICHLOROBENZENE	<5		
DICHLORODIFLUOROMETHANE	<5		
1,1 DICHLOROETHANE	<5		
1,2 DICHLOROETHANE	<5		
1,1 DICHLOROETHENE	<5		
T-1,2 DICHLOROETHENE	<5		
1,2 DICHLOROPROPANE	<5		
C-1,3 DICHLOROPROPENE	<5		
T-1,3 DICHLOROPROPENE	<5		
1,1,2,2 TETRACHLOROETHANE	<5		

RESPECTFULLY SUBMITTED,

SOUTHEAST LABORATORIES, INC.

Randy Brown
RANDY BROWN



- SINCE 1971

1490 Mecasin St., N.W. Atlanta, Ga. 30309 (404) 873-1896 (404) 873-1880

SEPTEMBER 10, 1987

LABORATORY REPORT

WESTON SPER
100 ATLANTA TECHNOLOGY CENTER
SUITE 120, BLDG. 100
1575 NORTHSIDE DRIVE, N.W.
ATLANTA, GEORGIA 30318

REPORT NO. 25083

ATTN: MR. HARRY M. JONES/ASHLEY BROWN

SAMPLE MARKING: SPSC02 8-24-87 1000, SPSC-02-01,02,03,
04,05.

TEST PROCEDURE: EPA TEST METHODS FOR EVALUATING SOLID WASTE,
NOVEMBER 1986, SW-846, 3RD ED., TESTED ON
PERKIN-ELMER 460 AND 1100 ATOMIC ABSORPTION
SPECTROPHOTOMETER.

RESULTS

	<u>MG/KG</u>
ARSENIC-----	<0.50
BERYLLIUM-----	<3
CADMIUM-----	<3
CHROMIUM-----	9.1
COPPER-----	80.8
LEAD-----	12.7
MERCURY-----	<0.05
NICKEL-----	<5
SELENIUM-----	<0.50
SILVER-----	<10
THALLIUM-----	<25
ZINC-----	20.7
CYANIDE-----	14

RESPECTFULLY SUBMITTED,

SOUTHEAST LABORATORIES, INC.

Randy Brown
RANDY BROWN

RB:DB



- SINCE 1971

1490 Mecaslin St. N.W. Atlanta Ga 30309 (404) 873-1896, 404 873-1880

SEPTEMBER 10, 1987

WESTON SPER
100 ATLANTA TECHNOLOGY CENTER
SUITE 120, BLDG. 100
1575 NORTHSIDE DRIVE, N. W.
ATLANTA, GEORGIA 30318

LABORATORY REPORT

REPORT NO. 25083-2

ATTN: MR. ASHLEY BROWN

SAMPLE MARKING: SPSC 02-01,02,03,04,05, 8-24-87 1000.

TEST PROCEDURE: EPA METHOD 601 AND 602 AS SET FORTH IN TEST METHODS FOR ORGANIC CHEMICAL ANALYSIS OF MUNICIPAL AND INDUSTRIAL WASTE EPA 600/4-82-027 JULY 1982.

RESULTS

<u>MICROGRAM/LITER</u> (PPB)		<u>MICROGRAM/LITER</u> (PPB)	
BROMODICHLOROMETHANE	<5	METHYLENE CHLORIDE	9
BROMOFORM	<5	TETRACHLOROETHENE	<5
BROMOMETHANE	<5	1,1,1-TRICHLOROETHANE	<5
CARBON TETRACHLORIDE	<5	1,1,2-TRICHLOROETHANE	<5
CHLOROBENZENE	<5	TRICHLOROETHENE	<5
CHLOROETHANE	<5	TRICHLOROFLUOROMETHANE	<5
2-CHLOROETHYL VINYL ETHER	<5	VINYL CHLORIDE	<5
CHLOROFORM	<5		
CHLOROMETHANE	<5	BENZENE	<50
DIBROMOCHLOROMETHANE	<5	TOLUENE	4,690
1,2-DICHLOROBENZENE	<5	ETHYLBENZENE	<50
1,3-DICHLOROBENZENE	<5	XYLENES	88,300
1,4-DICHLOROBENZENE	<5		
DICHLORODIFLUOROMETHANE	<5		
1,1-DICHLOROETHANE	<5		
1,2-DICHLOROETHANE	<5		
1,1-DICHLOROETHENE	<5		
T-1,2-DICHLOROETHENE	<5		
1,2-DICHLOROPROPANE	<5		
C-1,3-DICHLOROPROPENE	<5		
T-1,3-DICHLOROPROPENE	<5		
1,1,2,2-TETRACHLOROETHANE	<5		

RESPECTFULLY SUBMITTED,

SOUTHEAST LABORATORIES, INC.

Randy Brown
RANDY BROWN

RB:DB



- SINCE 1971

1490 Meadows Dr. N.W. Atlanta Ga 30309 (404) 873-1896 404 311-1820

SEPTEMBER 10, 1987

LABORATORY REPORT

WESTON SPER
100 ATLANTA TECHNOLOGY CENTER
SUITE 120, BLDG. 100
1575 NORTHSIDE DRIVE, N. W.
ATLANTA, GEORGIA 30318

REPORT NO. 25083-3

ATTN: MR. ASHLEY BROWN

SAMPLE MARKING: SPIC 01-01,02,03,04, 8-24-87 1005.

TEST PROCEDURE: EPA METHOD 601 AND 602 AS SET FORTH IN TEST METHODS FOR ORGANIC CHEMICAL ANALYSIS OF MUNICIPAL AND INDUSTRIAL WASTE EPA 600/4-82-027 JULY 1982.

RESULTS

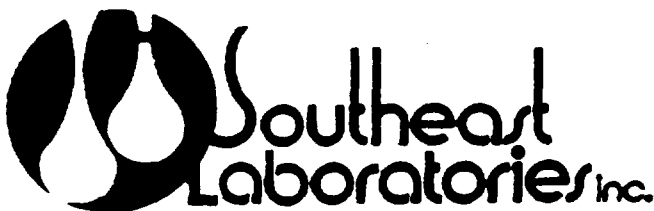
<u>MICROGRAM/LITER</u> (PPB)		<u>MICROGRAM/LITER</u> (PPB)	
BROMODICHLOROMETHANE	<5	METHYLENE CHLORIDE	<5
BROMOFORM	<5	TETRACHLOROETHENE	<5
BROMOMETHANE	<5	1,1,1-TRICHLOROETHANE	8,000
CARBON TETRACHLORIDE	<5	1,1,2-TRICHLOROETHANE	<5
CHLORO BENZENE	<5	TRICHLOROETHENE	<5
CHLOROETHANE	<5	TRICHLOROFLUOROMETHANE	<5
2-CHLOROETHYL VINYL ETHER	<5	VINYL CHLORIDE	<5
CHLOROFORM	<5		
CHLOROMETHANE	<5	BENZENE	<50
DIBROMOCHLOROMETHANE	<5	TOLUENE	2,520
1,2-DICHLORO BENZENE	<5	ETHYLBENZENE	460
1,3-DICHLORO BENZENE	<5	XYLENES	14,600
1,4-DICHLORO BENZENE	<5		
DICHLORO DIFLUOROMETHANE	<5		
1,1-DICHLOROETHANE	<5		
1,2-DICHLOROETHANE	<5		
1,1-DICHLOROETHENE	17		
T-1,2-DICHLOROETHENE	<5		
1,2-DICHLOROPROPANE	<5		
C-1,3-DICHLOROPROPENE	<5		
T-1,3-DICHLOROPROPENE	<5		
1,1,2,2-TETRACHLOROETHANE	<5		

RESPECTFULLY SUBMITTED,

SOUTHEAST LABORATORIES, INC.

Randy Brown
RANDY BROWN

RB:DB



- SINCE 1971

1490 Mecaslin St. N.W. Atlanta Ga 30309 (404) 873-1896 (404) 311-1830

SEPTEMBER 10, 1987

LABORATORY REPORT

WESTON SPER
100 ATLANTA TECHNOLOGY CENTER
SUITE 120, BLDG. 100
1575 NORTHSIDE DRIVE, N. W.
ATLANTA, GEORGIA 30318

REPORT NO. 25083-4

ATTN: MR. ASHLEY BROWN

SAMPLE MARKING: SPSA 01-GROUND, 8-24-87 1010.

TEST PROCEDURE: EPA METHOD 601 AND 602 AS SET FORTH IN TEST METHODS FOR ORGANIC CHEMICAL ANALYSIS OF MUNICIPAL AND INDUSTRIAL WASTE EPA 600/4-82-027 JULY 1982.

RESULTS

<u>MICROGRAM/LITER</u> (PPB)		<u>MICROGRAM/LITER</u> (PPB)	
BROMODICHLOROMETHANE	<5	METHYLENE CHLORIDE	<5
BROMOFORM	<5	TETRACHLOROETHENE	<5
BROMOMETHANE	<5	1,1,1-TRICHLOROETHANE	<5
CARBON TETRACHLORIDE	<5	1,1,2-TRICHLOROETHANE	<5
CHLOROBENZENE	<5	TRICHLOROETHENE	<5
CHLOROETHANE	<5	TRICHLOROFLUOROMETHANE	<5
2-CHLOROETHYL VINYL ETHER	<5	VINYL CHLORIDE	<5
CHLOROFORM	<5		
CHLOROMETHANE	<5	BENZENE	<50
DIBROMOCHLOROMETHANE	<5	TOLUENE	610
1,2-DICHLOROBENZENE	<5	ETHYLBENZENE	<50
1,3-DICHLOROBENZENE	<5	XYLENES	1,360
1,4-DICHLOROBENZENE	<5		
DICHLORODIFLUOROMETHANE	<5		
1,1-DICHLOROETHANE	<5		
1,2-DICHLOROETHANE	<5		
1,1-DICHLOROETHENE	<5		
T-1,2-DICHLOROETHENE	<5		
1,2-DICHLOROPROPANE	<5		
C-1,3-DICHLOROPROPENE	<5		
T-1,3-DICHLOROPROPENE	<5		
1,1,2,2-TETRACHLOROETHANE	<5		

RESPECTFULLY SUBMITTED,

SOUTHEAST LABORATORIES, INC.

Randy Brown
RANDY BROWN

RB:DB



- SINCE 1971

1490 Mecaslin St. N.W. Atlanta Ga 30309 (404) 873-1896, 404-873-1880

SEPTEMBER 10, 1987

LABORATORY REPORT

WESTON SPER
100 ATLANTA TECHNOLOGY CENTER
SUITE 120, BLDG. 100
1575 NORTHSIDE DRIVE, N. W.
ATLANTA, GEORGIA 30318

REPORT NO. 25083-5

ATTN: MR. ASHLEY BROWN

SAMPLE MARKING: SPCS 01-GROUND, 8-24-87 1015.

TEST PROCEDURE: EPA METHOD 601 AND 602 AS SET FORTH IN TEST METHODS FOR ORGANIC CHEMICAL ANALYSIS OF MUNICIPAL AND INDUSTRIAL WASTE EPA 600/4-82-027 JULY 1982.

RESULTS

<u>MICROGRAM/LITER</u> (PPB)		<u>MICROGRAM/LITER</u> (PPB)	
BROMODICHLOROMETHANE	<5	METHYLENE CHLORIDE	<5
BROMOFORM	<5	TETRACHLOROETHENE	<5
BROMOMETHANE	<5	1,1,1-TRICHLOROETHANE	<5
CARBON TETRACHLORIDE	<5	1,1,2-TRICHLOROETHANE	<5
CHLOROBENZENE	<5	TRICHLOROETHENE	<5
CHLOROETHANE	<5	TRICHLOROFLUOROMETHANE	<5
2-CHLOROETHYL VINYL ETHER	<5	VINYL CHLORIDE	<5
CHLOROFORM	<5		
CHLOROMETHANE	<5	BENZENE	<50
DIBROMOCHLOROMETHANE	<5	TOLUENE	<50
1,2-DICHLOROBENZENE	<5	ETHYLBENZENE	<50
1,3-DICHLOROBENZENE	<5	XYLENES	<50
1,4-DICHLOROBENZENE	<5		
DICHLORODIFLUOROMETHANE	<5		
1,1-DICHLOROETHANE	<5		
1,2-DICHLOROETHANE	<5		
1,1-DICHLOROETHENE	<5		
T-1,2-DICHLOROETHENE	<5		
1,2-DICHLOROPROPANE	<5		
C-1,3-DICHLOROPROPENE	<5		
T-1,3-DICHLOROPROPENE	<5		
1,1,2,2-TETRACHLOROETHANE	<5		

RESPECTFULLY SUBMITTED,

SOUTHEAST LABORATORIES, INC.

Randy Brown
RANDY BROWN

RB:DB

ANNEX B

Quality Assurance/
Quality Control Data

CONTRACT NO: 68-01-736		CONTRACTOR: ROY F. WESTON, INC.		TDD NO. 04881026A	
REPORTING ELEMENT: TAT004		DATE(S) OF REPORTED OBSERVATION 10/01/88 TO 06/01/89		APPROX. NO. OF HOURS 160	
PERFORMANCE EVALUATION CATEGORY: 11 REMOVALS (FUNDED) CERCLA 104C				<input type="checkbox"/> FORMAL REPORT <input checked="" type="checkbox"/> LETTER REPORT <input type="checkbox"/> FORMAL BRIEFING <input type="checkbox"/> OTHER (SPECIFY)	
DESCRIPTION OF CONTRACTOR OBSERVATION BY: NAME/TITLE CONLEY B. PHIFER					
TAT WAS TASK WITH PROVIDING REMOVAL SUPPORT, GENERAL TECHNICAL ASSISTANCE, AND PRP MONITORING INVOLVING PRINTING WASTES AT THE SPECTRUM PRINTING FACILITY LOCATED IN COVINGTON, NEWTON CO., GA. TAT ASSISTED THE PRP CONTRACTOR IN THE DEVELOPMENT OF A COMPREHENSIVE SITE SAFETY PLAN, PROVIDED EXPERTISE IN SAMPLING PROTOCOL, AND DOCUMENTED ALL ASPECTS OF THE REMOVAL. TAT MADE NUMEROUS SUGGESTIONS TO THE PRP WHICH WERE (SEE ATTACHMENT)					
RATING: 5,4,3,2,1 3		SIGNATURE OF CONTRACTOR: <i>Conley B Phifer</i>			DATE: 6/12/89
DESCRIPTION OF EPA OBSERVATION BY: NAME/TITLE					
RATING: 5,4,3,2,1		SIGNATURE OF EPA:			DATE:
SIGNATURE OF REGIONAL POR COORDINATOR:					DATE:
HQ COORDINATOR'S EVALUATION BY: NAME/TITLE					
RATING: 5,4,3,2,1		SIGNATURE OF HQ:			DATE:
DPO ACTION: <input type="checkbox"/> ACCEPTED <input type="checkbox"/> ACCEPTED WITH EXCEPTIONS <input type="checkbox"/> REJECTED					
COST TO DATE:		DATE: 06/01/89		ACTUAL TOTAL HOURS: 173	
TOTAL COST TO CLOSURE:					
I CERTIFY THAT THE ATTACHED MATERIALS MEET AND COMPLY WITH ALL REQUIREMENTS OF THE SUBJECT TDD.					DATE: 6/12/89 INTERIM
<i>Conley B Phifer</i> TATL SIGNATURE (INTERIM)			TATL SIGNATURE (FINAL)		
I ACKNOWLEDGE THAT I HAVE BEEN PROVIDED WITH THE MATERIALS AND SERVICES SPECIFIED IN THE SUBJECT TDD WITHIN ITS ORIGINAL OR REVISED TIME FRAMES.					DATE: 6/16/89 INTERIM
<i>Carol J. Marshall</i> DPO SIGNATURE (INTERIM)			DPO SIGNATURE (FINAL)		

WHITE : HQTRS COORDINATOR
 WHITE : DPO COPY
 BLUE : TATL COPY
 GREEN : ZPM COPY
 CANARY : PROJECT OFFICER COPY
 PINK : CONTRACTING OFFICER COPY
 GOLDENROD : DPO (INTERIM COPY)

TDD #04-8810-26-2026
#04-8810-26A-2213

(ATTACHMENT)

SPECTRUM PRINTING
COVINGTON, NEWTON CO., GA

SUBSEQUENTLY RESPONSIBLE FOR INCREASING THE OVERALL TIMELINESS AND EFFECTIVENESS OF THE ACTION. TAT MAINTAINED CONSTANT CONTACT WITH THE OSC APPRISING HIM OF REMOVAL PROGRESS AND PROBLEMS ENCOUNTERED. A DETAILED REPORT IS CURRENTLY BEING COMPILED TO DOCUMENT PRP ACTIONS AT THIS SITE.

TAT CRAF CONTRACT PERFORMANCE OBSERVATION REPORT
PART II. EVALUATION CRITERIA RATING WORKSHEET

CONTRACT NO: 68-01- 7367	CONTRACTOR: Roy F. Weston	TOO NO: 04881026, A
REPORTING ELEMENT: <i>Region IV</i>	DATE(S) OF REPORTED OBSERVATION <i>10/1/88 to 6/1/89</i>	APPROX. NO. OF HOURS <i>173</i>
PERFORMANCE EVALUATION CATEGORY: <i>Removals</i>		
CONTRACTOR REPRESENTATIVE <i>[Signature]</i>		EPA PERFORMANCE MONITOR <i>K. Kutz</i>

PERFORMANCE CRITERIA	RATING	SUPPORTING COMMENTS
PROJECT PLANNING - ORGANIZING (E.G., WORK PLAN DEVELOPMENT, DATA REVIEW) - SCHEDULING - BUDGETING <i>Bill, Please fill in</i>	_____ 5 _____ 4 _____ 3 _____ 2 _____ 1	
TECHNICAL COMPETENCE & INNOVATION - EFFECTIVENESS OF ANALYSIS - MEET PLAN GOALS - ADHERE TO REGS. & PROCEDURES - APPROACH CREATIVITY/INGENUITY	_____ 5 _____ 4 _____ 3 _____ 2 _____ 1	
SCHEDULE & COST CONTROL - BUDGET (HOURS & COST) MAINTENANCE - PRIORITY SCHEDULE ADJUSTMENTS - COST MINIMIZATION	_____ 5 _____ 4 _____ 3 _____ 2 _____ 1	
REPORTING - TIMELINESS OF DELIVERABLES - CLARITY - THOROUGHNESS	_____ 5 _____ 4 _____ 3 _____ 2 _____ 1	
RESOURCE UTILIZATION - STAFFING - SUBCONTRACTING - EQUIPMENT, TRAVEL, ETC.	_____ 5 _____ 4 _____ 3 _____ 2 _____ 1	<i>Report was 2 1/2 months late.</i>
EFFORT - RESPONSIVENESS - MOBILIZATION - DAY TO DAY - SPECIAL SITUATIONS (IF G., ADVERSE/ DANGEROUS CONDITIONS)	_____ 5 _____ 4 _____ 3 _____ 2 _____ 1	



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IV

345 COURTLAND STREET, N.E.
ATLANTA, GEORGIA 30365

ENFORCEMENT CONFIDENTIAL

MEMORANDUM

DATE: FEB 5 1990

SUBJECT: Decision not to Take Cost Recovery Action Regarding
Spectrum Printing Company, Inc. Removal Site
(EPA ID #9N)

A. Site Description

The Site in question was formerly operated as a printing facility by Spectrum Printing Co., Inc. In October 1987, EPA was notified of the proposed sale of the Site in connection with the company's bankruptcy proceeding under Chapter 7. In response, the Department of Justice, acting on behalf of EPA, notified the company that EPA had obtained information that there had been a release of hazardous substances at the Site and that EPA was evaluating whether EPA would take action at the Site pursuant to Section 104 of CERCLA. Subsequently, in 1988, EPA entered into an "Agreement," under which the company has performed the needed removal activities. The removal has been completed.

B. Work Authorized and Conducted and Associated Costs

When EPA was first notified of this Site, the materials stored outside the building were sampled using the Emergency Response and Control Section's Technical Assistance Team (TAT) contractor. Sample results revealed the presence of solvents in waste ink. After the Agreement was executed, the TAT contractor was again used to perform on-site monitoring to insure that the company's contractor complied with the Agreement and any applicable rules and regulations.

EPA's expenditures were as follows:

Contracts	\$3,713.37
Payroll	650.54
Indirect	<u>1,668.00</u>
	\$6,031.91

C. Discussion of Basis Not To Pursue Cost Recovery

The basis for the decision not to pursue cost recovery for this Site includes the following facts:

1. The principal reason not to pursue cost recovery for this Site is the insolvency of the company which owned and operated the Site.

Even though the company had filed for bankruptcy under Chapter 7 of the Bankruptcy Code, we were able to obtain the agreement of the bankruptcy trustee to conduct the needed removal activities. The work was done under an "Agreement" entered into under Sections 104, 106(a) and 122(a) of CERCLA, which incorporated an approved Immediate Removal Work Plan. In view of our lack of authority to issue an order to the bankrupt compelling the work to be done, the Agreement was somewhat less formal than an Administrative Order, and it did not include a provision for the payment of oversight costs.

The bankruptcy action remains pending according to the attorney for the trustee. In this situation, our sole recourse would have been the filing of a proof of claim in the bankruptcy, and the bar date for such a filing has passed and likely had already passed when the Agreement was executed. Consequently, these oversight costs should be considered not recoverable due to the bankruptcy of the responsible party.

2. Aside from the insolvency of the corporate owner, other factors support the decision not to pursue cost recovery. While we did not explicitly waive payment of oversight costs in the Agreement, we did not request them and should not pursue them after the fact, particularly in light of the cooperation of the company's representatives in agreeing to conduct the work needed. In addition, the automatic stay in bankruptcy would preclude our taking formal action outside of the bankruptcy court to recover our costs.


D. Conclusion

In light of the insolvency and pending bankruptcy of the corporate owner and operator and the cooperation of the bankruptcy trustee in conducting the removal, cost recovery action for EPA's costs of \$6,031.91 should not be pursued.

Reviewer: 

Project Manager, Cost Recovery Section

Concurrences:

 2/1/90
Office of Regional Counsel

 2/1/90
Chief, South Cost Recovery Unit

- 3 -
Michael J. Hurlbutt for B. Spagg 2/1/90
Chief, Cost Recovery Section

[Signature] 2/2/90
Chief, Waste Programs Branch

Patricia M. Torri 2-5-90
Director, Waste Management Division

Yellow

AGREEMENT

I. Parties and Jurisdiction

This Agreement is entered into by and between Richard D. Ellenburg, in his capacity as Trustee in Bankruptcy for Spectrum Printing Company, Inc. (hereafter "the Trustee"), and the United States Environmental Protection Agency (hereafter "EPA"), pursuant to the authority vested in the President of the United States by Section 104, Section 106(a), and Section 122(a) of the Comprehensive Environmental Response, Compensation and Liability Act of 1980 (hereafter "CERCLA"), 42 U.S.C. Section 9604, Section 9606(a), and Section 9622(1), as amended by the Superfund Amendments and Reauthorization Act of 1986 (hereafter called "SARA"), P.L. 99-499 (CERCLA, as amended, may sometimes be hereafter referred to simply as "CERCLA"). SARA portions of the above-cited sections were delegated by the President to the Administrator of EPA by Executive Order 12580, dated January 23, 1987, 52 Fed. Reg. 2923 (Jan. 29, 1987), and were redelegated by interim delegations of the Administrator of EPA to Regional Administrators and Assistant Administrators in EPA Delegation Nos. 14-8-B and 14-14-C, dated February 26, 1987. The Trustee consents to and will not contest EPA jurisdiction or authority to enter into this Agreement.

This Agreement concerns the proposed removal of hazardous substances from the printing facility formerly operated by Spectrum Printing, Company, Inc. in Covington, Georgia (hereafter "the Site").

II. EPA Determinations

For the purposes of this Agreement, EPA has determined that:

A. The release and threat of release of hazardous substances from the Site may present an imminent and substantial endangerment to the public health or welfare or the environment;

B. In order to protect public health and welfare and the environment, it is necessary that action be taken to mitigate the release and threat of release of hazardous substances from the Site into the environment; and

C. The actions undertaken to be performed by the Trustee under this Agreement are consistent with the National Contingency Plan, 40 CFR Part 300, as amended.

III. Work To Be Performed

It is hereby agreed that the following activities will be performed:

A. An Immediate Removal Plan has been submitted on behalf of the Trustee and is incorporated herein by reference as Exhibit A.

B. A comprehensive Site Safety Plan is to be submitted on behalf of the Trustee within Fourteen (14) days of the effective date of this Agreement. Within Seven (7) days of receipt of the Site Safety Plan, EPA shall notify the Trustee in writing of EPA's approval or disapproval of the Site Safety Plan or any part thereof. In the event of any disapproval, EPA shall specify in writing both the

deficiencies and any EPA recommended modifications.

C. Within seven (7) days of the receipt of EPA notification of Site Safety Plan disapproval, the Trustee shall amend and submit to EPA a revised plan. In the event of subsequent disapproval of the plan, EPA retains the right to undertake removal or other action pursuant to its authority under CERCLA.

D. Within five (5) days of EPA approval of the Site Safety Plan, the Trustee shall begin implementation of the tasks detailed in the approved Immediate Removal Plan and Site Safety Plan. The Trustee shall complete implementation within Ninety (90) days of the execution of this Agreement.

E. All actions carried out by the Trustee pursuant to this Agreement shall be done under the oversight of EPA through its On-Scene Coordinator.

F. The Trustee shall assure access to the Site by EPA and its employees, contractors and consultants for the purposes of overseeing and monitoring the implementation of this Agreement.

G. The Trustee shall notify EPA Seven (7) days in advance of each action to be taken at the Site pursuant to this Agreement.

H. All actions carried out by the Trustee pursuant to this Agreement shall be done in accordance with all applicable federal, state, and local laws.

I. Upon request, the Trustee will provide EPA with split samples of any samples collected in connection with the performance of this Agreement.

J. All response work performed pursuant to this Agreement shall be under the direction and supervision of a qualified professional engineer or other qualified professional with expertise and experience in hazardous waste site cleanup. The Trustee shall notify EPA as to such engineer or other qualified professional and of any contractors and subcontractors to be used in carrying out the terms of this Agreement promptly following the execution of this Agreement or in advance of their involvement at the Site, whichever is the later.

K. The Trustee shall use quality assurance/quality control, and chain-of-custody procedures in accordance with EPA Region IV Environmental Services Division, Standard Operating Procedures and Quality Assurance Manual, April 1, 1986, throughout all activities. The Trustee shall consult with EPA in planning for sampling and analysis. The Trustee shall provide a quality control report to EPA certifying that all activities have been performed as approved.

L. The Trustee shall preserve all records developed pursuant to the implementation of this Agreement for a period of at least Six (6) years following completion of all work performed pursuant to this Agreement.

M. Any reports, plans, specifications, schedules and attachments required by this Agreement are, upon approval by EPA, incorporated into this Agreement.

N. All submittals and notifications to EPA pursuant to this Agreement shall be made to:

Bill Klutz
On-Scene Coordinator
Superfund Branch
Waste Management Division
U.S. EPA - Region IV
345 Courtland Street, N.E.
Atlanta, Georgia 30365
404/347-3931

O. The Trustee shall provide adequate documentation of the proper disposal of all hazardous substances, by providing the On-Scene Coordinator with shipment manifests and corresponding inventories.

IV. Reservation of Rights

Nothing in this Agreement will constitute or be construed as a release from any claim, cause or action or demand in law or equity against any person, firm, partnership, or corporation for any liability it may have arising out of or relating in any way to the generation, storage, treatment, handling, transportation, release, or disposal of any hazardous substances, hazardous waste, pollutants, or contaminants found at, taken to, or taken from the Site.

This Agreement does not constitute any decision on preauthorization of funds under Section 111(a)(2) of CERCLA.

In entering into this Agreement, the Trustee waives any right to seek reimbursement under Section 106(b)(2) of CERCLA, 42 U.S.C. Section 9606(b)(2), for any past costs associated with this Site, or any costs incurred in complying with this Agreement.

EPA reserves the right to take any enforcement action pursuant to CERCLA or any other available legal authority, including

the right to seek injunctive relief, monetary penalties, and punitive damages for any violation of law or this Agreement.

V. Notification of the State

Pursuant to Section 106(a) of CERCLA, 42 U.S.C. Section 9606(a), the State of Georgia has been notified of this Agreement by EPA.

VI. Effective Date and Completion

The effective date of this Agreement shall be the date on which it is signed on behalf of EPA or the date on which it is approved by the Bankruptcy Court, whichever is later.

The provisions of this Agreement will be deemed fulfilled upon the Trustee's receipt of written notice from EPA that the Trustee has demonstrated to the satisfaction of EPA that all the terms of this Agreement have been completed. Such written notice shall not be unreasonably withheld.

IT IS SO AGREED:

BY: _____
Richard Ellenberg, as Trustee for
Spectrum Printing

Date

BY: _____
U.S. Environmental Protection Agency

Date

This agreement entered into among the Environmental Protection Agency and the Trustee is hereby approved by the Bankruptcy Court.

This _____ day of _____, 1988.

Braden
4/27/88

ASBELL

A
4/27/88

BOILEN

Boilen
4/28/88

KLUTZ

W.K.
4/25/88

Rogers

JOURDAN

Jordan
5/2/88

STONEBRAKER

Stonebraker
5/3/88

TOBIN

Tobin
5-3-88

Yellow Copy

EXHIBIT 1

IMMEDIATE REMOVAL PLANS

1. Within ten days from approval of the Agreement by the Trustee, the EPA, and the Bankruptcy Court, the Trustee's contractor will mobilize a chemist and two technicians to the site to spend one to two days to sample, and perform hazard categorization and staging. The contractor currently understands that there are sixty 5-gallon ink pails, three 55-gallon drums of isopropyl alcohol, and one hundred eighty-five 55-gallon drums (most of which are open and appear to contain water). Additionally, two areas of contaminated dirt (estimated to contain approximately ten 55-gallon drums) will be excavated. Sludge under the presses will be cleaned up and disposed of.

2. During this initial staging, the Trustee's Contractor will composite five different waste streams consisting of water, inks, isopropyl alcohol, adhesives, and contaminated dirts and sludges. As needed, the waste streams will be analyzed in order to obtain disposal approval.

3. When the sample results are returned and disposal approval is gained, the Trustee's contractor will remobilize one chemist, two technicians, and an operator to bulk and dispose of the materials. Should the water be classified as non-hazardous, the Trustee's contractor will, on behalf of the Trustee, obtain permits to discharge to sewers. Inks will be returned to the

manufacturer. Flammable liquids will be tendered to M&J Solvents in Atlanta. The adhesives and dirt (if tested as hazardous) will be tendered to the Chemical Waste Management Landfill in Emelle, Alabama.

4. Other trash, pallets, and empty drums will be tendered to a sanitary landfill. This "cleaning" portion of the job, as set forth in paragraphs 3 and 4 herein, is estimated to take approximately seven days. The Trustee's contractor will be using a vacuum unit, forklift, and backhoe.

5. At each stage of the proceeding, the Trustee's contractor will offer to the Agency duplicate copies of the results of analyses performed. The Trustee's contractor has represented to the Trustee that necessary permits and arrangements will be made in accordance with applicable environmental laws.

6. All work performed pursuant to this Immediate Removal Plan shall be under the direction and supervision of qualified personnel with expertise and experience in hazardous waste site clean up.

HANSELL & POST

A PARTNERSHIP INCLUDING PROFESSIONAL CORPORATIONS

THIRTY-THIRD FLOOR FIRST ATLANTA TOWER
ATLANTA, GEORGIA 30383-3101
TELEPHONE 404 581-8000
TELECOPIER 404 581-8330
TELEX 54-2711

56 PERIMETER CENTER EAST, N.E.
FIFTH FLOOR
ATLANTA, GEORGIA 30346-2283
1667 K STREET, N.W.
SUITE 500
WASHINGTON, D.C. 20006-1692

July 19, 1988

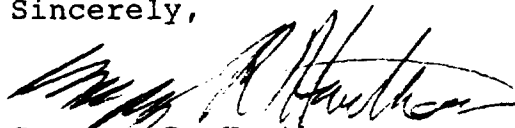
Mr. William Klutz
Hazardous Waste Law Branch
United States Environmental
Protection Agency
Region IV
345 Courtland Street, N.E.
Atlanta, Georgia 30365

RE: Spectrum Printing Site

Dear Bill:

Enclosed please find a copy of the Notice received from the United States Bankruptcy Court setting a hearing on the Motion to Approve the Trustee's entering into a Contract with the Environmental Protection Agency. You will note that the hearing is set for August 16, 1988. Also, as stated in the Notice, objections to the Motion must be filed with the Clerk of the Court not later than five working days prior to the hearing. At this time, we are unaware of any objections having been filed.

Sincerely,



Gregory R. Hanthorn

GRH/dr

Enclosure.

cc: Truly F. Bracken, Esquire

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION

IN RE :
SPECTRUM PRINTING CO., INC., : CASE NO. A87-04856-ADK
Debtor. :

NOTICE

Notice is hereby given that Trustee has filed a motion to enter into a contract with the Environmental Protection Agency to cause removal of certain hazardous waste from the property of the Estate and to hire the contractors necessary to perform such work. Trustee has requested that approval of the contract be conditioned upon the Estate and Trustee not being subject to liability for breach of the contract and Trustee being authorized to delegate any and all duties under the contract.

Trustee has also filed a motion to obtain secured financing to fund the work called for under said Agreements. The secured financing motion proposes that the holder of a deed to secure debt on the property in question, The First National Bank of Atlanta, provide the funding to be secured by the same collateral and priority held by that lender as of the filing of the petition in this case.

Copies of all such motions are filed with the Clerk of the Court and available for inspection.

Notice is hereby given that a hearing shall be held upon said Motions before the Court on the 16th day of Aug., 1988 at 10:00 o'clock A.M. in Room 1706, United States Bankruptcy Court, 75 Spring Street, S.W., Atlanta, Georgia 30303. Notice is further given that any objections to said Motions must be filed with the Clerk of this Court not later than five (5) working days prior to the said hearing with a copy served upon counsel for Trustee.

SO ORDERED this 14 day of July, 1988.

A. D. KAHN
A. D. KAHN
United States Bankruptcy Judge

Prepared by:

James S. Altman
James S. Altman
83 Walton Street, N.W.
Atlanta, Georgia 30303
(404) 525-4000



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IV

345 COURTLAND STREET
ATLANTA, GEORGIA 30365

*Copy to Spectrum
12*

Ms. Cindy Love
Haztech Inc.
5280 Panola Industrial Blvd.
Decatur Ga. 30065

Dear Cindy:

In reference to our conversation of December 14, 1988 regarding the hazardous waste classification of the organic material at the Spectrum Printing site in Covington, Georgia. Subsequent to an indeterminate finding by Region IV RCRA, and review of the data, the organic/pigmented waste at the site is not representative of a K086 classification. However, due to the presence of organic solvents in EPA's composite sampling and the large quantity of organic solvents present at the site, the pigmented organic compounds appear to belong to the F003, F005 and/or the D001 listings where applicable. Both F class waste codes are appropriate for nonhalogenated solvent waste from nonspecific sources. D001 could also apply, since most solvent waste have a flashpoint of less than 140 degrees Fahrenheit.

If you have any questions or want to discuss this further please give me a call at 404/347-3931.

Sincerely

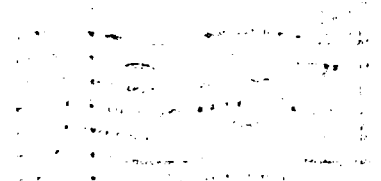
Bill Klutz

GRH

HANSELL & POST

A PARTNERSHIP INCLUDING PROFESSIONAL CORPORATIONS

THIRTY-THIRD FLOOR FIRST ATLANTA TOWER
ATLANTA, GEORGIA 30383-3101



13

Mr. William Klutz
Hazardous Waste Law Branch
United States Environmental
Protection Agency
Region IV
345 Courtland Street, N.E.
Atlanta, Georgia 30365

ROUTING AND TRANSMITTAL SLIP

Date

5/8/84

TO: (Name, office symbol, room number,
building, Agency/Post)

Initials

Date

1. Bill Klutz

2.

3.

4.

5.

Action	File	Note and Return
Approval	For Clearance	Per Conversation
As Requested	For Correction	Prepare Reply
Circulate	For Your Information	See Me
<input checked="" type="checkbox"/> Comment	Investigate	Signature
Coordination	Justify	

REMARKS

This is a copy of the letter I had planned to send to Hawthorn. Let me know if you know changes you'd like made — or if you or someone in your management should sign it. Thanks — Truly

DO NOT use this form as a RECORD of approvals, concurrences, disposals, clearances, and similar actions

FROM: (Name, org. symbol, Agency/Post)

Truly Bracken - ORC

Room No.—Bldg.

Phone No.

5041-102

★ U.S. GPO: 1967-181-246/40023

OPTIONAL FORM 41 (Rev. 7-76)
Prescribed by GSA
FPMR (41 CFR) 101-11.206

Mr. Gregory R. Hanthorn
Hansell & Post
First Atlanta Tower
Atlanta, Georgia 30383-3101

Re: Spectrum Printing Company, Inc. Site

Dear Mr. Hanthorn:

We have received the manifests documenting the shipment of wastes from the Spectrum Printing Company, Inc. site, together with the data from sampling conducted at the site. Based upon these documents and other information previously provided to EPA and its Technical Assistance Team contractor, you are hereby notified that the terms of the Removal Agreement regarding this site have been satisfactorily completed.

We appreciate your continued cooperation in seeing this removal action through to completion.

Sincerely,

Truly F. Bracken
Assistant Regional Counsel
Hazardous Waste Law Branch

bcc: Bill Klutz

TBRACKEN/5-5-89

Westinghouse
Environmental Services

Westinghouse HAZTECH, Inc.

June 5, 1989

5280 Panola Industrial Boulevard
Decatur, Georgia 30035
(404) 981-9332
(404) 981-9339 (24 Hr.)
FAX (404) 981-1786

Mr. Richard Ellenberg, Trustee
c/o Mr. Gregory R. Hanthorn
Hansell and Post
First Atlanta Tower, 33rd Floor
Atlanta, Georgia 30383-3101

RE: Spectrum Printing
Project Documents
Project Number 2322-88-1240

Dear Mr. Ellenberg:

Please find attached the original, completed manifest for the five final drums of waste shipped from Spectrum to Rineco. As per 40 CFR Part 268.7 (a)(6) this documentation must be kept on file for five years from the final date of waste shipment.

Sincerely,

Westinghouse Environmental
and Geotechnical Services, Inc.



Cynthia Love
Project Manager

cc: Mr. Bob Handler
First National Bank of Atlanta
Mail Code 212, 2 Peachtree Street
Atlanta, GA 30349

Mr. Bill Klutz
Environmental Protection Agency
345 Courtland Street, N.E.
Atlanta, GA 30365

Please print or type. (Form designed for use on elite (12-pitch) typewriter.)

Form Approved. OMB No. 2050-0039. Expires 9-30-91

AR 12-88

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator's US EPA ID No. GA D 9 8 1 2 2 6 3 3 5 9 3 1 2 6 1 0	Manifest Document No. 1 of 1	2. Page 1	Information in the shaded areas is not required by Federal law.
3. Generator's Name and Mailing Address Spectrum Printing 5280 Panola Industrial Blvd., Decatur, GA 30035			A. State Manifest Document Number AR-393260		
4. Generator's Phone (404) 981-9332			B. State Generator ID Number GA0000000000		
5. Transporter 1 Company Name EASE Transportation, Inc.			C. State Transporter ID Number GA0000000000		
7. Transporter 2 Company Name			D. State Transporter ID Number		
9. Designated Facility Name and Site Address Rineco Chemical Industrial 1007 Vulcan Road. Benton, AR. 72015			E. State Facility ID Number AR0000000000		
10. US EPA ID Number AR D 9 8 1 0 5 7 8 7 1 0			F. Facility's Phone 501-778-9089		
11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)			12. Containers No. Type	13. Total Quantity	14. Unit Wt/Vol
a. RQ Waste Combustible Liquid, n.o.s., NA 1993. (Combustible Liquid) F003, F005			1 DIM	250	G
b.					
c.					
d.					
Additional Descriptions for Materials Listed Above			EMERGENCY RESPONSE INFORMATION		
15. Special Handling Instructions and Additional Information In case of emergency, call 1-800-424-9300					
16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations and Arkansas state regulations. If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.					
Printed/Typed Name Richard D. Ellenberg Trustee of Spectrum Printing			Signature Richard D. Ellenberg Trustee of Spectrum Printing Month Day Year 4/14/89		
17. Transporter 1 Acknowledgement of Receipt of Materials			Signature Month Day Year 4/14/89		
18. Transporter 2 Acknowledgement of Receipt of Materials			Signature Month Day Year		
19. Discrepancy Indication Space					
20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in item 19.					
Printed/Typed Name James D. Roberts			Signature James D. Roberts Month Day Year 4/14/89		

EPA Form 8700-22 (Rev. 9-88) Previous edition is obsolete.

NOTICE: THE ORIGINAL AND NOT LESS THAN TWO (2) COPIES MUST MOVE WITH THE HAZARDOUS WASTE SHIPMENT. ONCE DELIVERED, THE TREATMENT/STORAGE/DISPOSAL FACILITY MUST RETURN THIS ORIGINAL COPY TO THE GENERATOR.

ROUTING AND TRANSMITTAL SLIP

Date

TO: (Name, office symbol, room number, building, Agency/Post)		Initials	Date
1.	Bill Klutz		
2.			
3.			
4.			
5.			

Action	File	Note and Return
Approval	For Clearance	Per Conversation
As Requested	For Correction	Prepare Reply
Circulate	<input checked="" type="checkbox"/> For Your Information	See Me
Comment	Investigate	Signature
Coordination	Justify	

REMARKS

Hawthorns would like to see ~~the~~ A Site Safety Plan as soon as possible. You could get over to me or talk to Hawthorns or his contractor directly.

DO NOT use this form as a RECORD of approvals, concurrences, disposals, clearances, and similar actions

FROM: (Name, org. symbol, Agency/Post)

Room No.—Bldg.

Trudy Brackton - OEC

Phone No.
2641

5041-102

☆ U.S. GPO: 1987-181-246/40023

OPTIONAL FORM 41 (Rev. 7-76)
Prescribed by GSA
FPMR (41 CFR) 101-11.206

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

DATE: NOV 27 1988

SUBJECT: Identification of RCRA Hazardous Wastes at
Spectrum Printing Company in Covington, Georgia

FROM: Craig Brown *CB*
RCRA Branch

TO: Bill Klutz
Superfund Branch

A hazardous waste removal contractor has been retained to clean up the Spectrum Printing site located in Covington, Georgia. One of the clean-up/removal alternatives under consideration is consolidation and stabilization of some 300 containers of waste with subsequent disposal in a solid waste landfill. Unless it can be reasonably ascertained that there are no RCRA listed hazardous wastes present at this site EPA should not approve any plan which involves wholesale consolidation and stabilization of wastes, particularly if the treated waste is to be disposed of in a solid waste landfill.

It is my understanding that waste characterization carried out during the site investigation was limited to obtaining a physical description of the wastes and testing several composite samples for specific constituents. Although this type of information is useful in sorting waste containers into compatible groups to facilitate safe handling it has little practical value in terms of identifying RCRA hazardous wastes.

Characteristic hazardous wastes can be easily identified by testing representative waste samples for ignitability, corrositivity, E P toxicity, and reactivity as specified in 40 CFR Part 261 and Test Methods for Solid Waste (SW-846). Identifying listed hazardous wastes that may be present at the site would be more difficult since RCRA waste listings are source specific and/or chemical specific. However, print shops which use certain solvents for cleaning presses and other equipment would be expected to generate spent solvents (F001-F005). Additionally, print shops which formulate or mix their own lead or chrome based inks would be expected to generate wash water and sludge from cleaning the mixing equipment (K086). It could reasonably be assumed that inks were formulated onsite if the facility is equipped with mixing vessels or grinding mills.

The best way to determine what if any listed hazardous wastes may be present at the Spectrum Printing site would be to interview the former owner or employees. If this is not possible an indication of the types of waste present at the Spectrum site can be provided from waste audits of print shops similar to the Spectrum Printing Company. However, even if waste composition data were available, direct comparison of samples of waste from Spectrum to wastes generated by active print shops may not be conclusive given that some of the containers at Spectrum were left uncovered, outdoors for months. Finally, if there are drums of unused chemicals inside the building at the Spectrum site the labels on the drums may be checked against the list of commercial chemical products in 40 CFR §261.33, which are hazardous wastes when discarded.

PA/SE TO
B. Jordan 19/8/87

**INVESTIGATION REPORT
FOR
SPECTRUM PRINTING SITE
COVINGTON, GEORGIA**

**FROM: J. A. Brown
TAT, Region IV**

**TO: Bill Klutz, OSC
EPA, Region IV**

**Technical Direction Document
TDD #04-8708-03-1225
TAT #04-F-00929**

DATE: 17 September 1987

**Technical Assistance Team
Roy F. Weston, Inc., SPER Division
100 Atlanta Technology Center, Suite 120
1575 Northside Dr., NW,
Atlanta, Georgia 30318**



- SINCE 1971

1490 Mecaslin St., N.W. Atlanta, Ga. 30309 (404) 873-1896 (404) 873-1880

SEPTEMBER 10, 1987

LABORATORY REPORT

WESTON SPER
100 ATLANTA TECHNOLOGY CENTER
SUITE 120, BLDG. 100
1575 NORTHSIDE DRIVE, N. W.
ATLANTA, GEORGIA 30318

REPORT NO. 25083

ATTN: MR. HARRY M. JONES/ASHLEY BROWN

SAMPLE MARKING: SPSC01 8-24-87, 0950.

TEST PROCEDURE: EPA TEST METHODS FOR EVALUATING SOLID WASTE,
NOVEMBER 1986, SW-846, 3RD ED., TESTED ON
PERKIN-ELMER 460 AND 1100 ATOMIC ABSORPTION
SPECTROPHOTOMETER.

RESULTS

	<u>MG/KG</u>
ARSENIC-----	<0.50
BERYLLIUM-----	<3
CADMIUM-----	<3
CHROMIUM-----	14.8
COPPER-----	270
LEAD-----	8.3
MERCURY-----	<0.05
NICKEL-----	<5
SELENIUM-----	<0.50
SILVER-----	<10
THALLIUM-----	<25
ZINC-----	7.3
CYANIDE-----	2.5

NOTE: TEST PROCEDURES ENCLOSED.

RESPECTFULLY SUBMITTED,

SOUTHEAST LABORATORIES, INC.

Randy Brown
RANDY BROWN

RB:MS



- SINCE 1971

1490 Mecaslin St., N.W. Atlanta, Ga 30309 (404) 873-1896 (404) 873-1880

SEPTEMBER 10, 1987

LABORATORY REPORT

WESTON SPER
100 ATLANTA TECHNOLOGY CENTER
SUITE 120, BLDG. 100
1575 NORTHSIDE DRIVE, N.W.
ATLANTA, GEORGIA 30318

REPORT NO. 25083

ATTN: MR. HARRY M. JONES/ASHLEY BROWN

SAMPLE MARKING: SPSC02 8-24-87 1000, SPSC-02-01,02,03,
04,05.

TEST PROCEDURE: EPA TEST METHODS FOR EVALUATING SOLID WASTE,
NOVEMBER 1986, SW-846, 13RD ED., TESTED ON
PERKIN-ELMER 460 AND 1100 ATOMIC ABSORPTION
SPECTROPHOTOMETER.

RESULTS

	<u>MG/KG</u>
ARSENIC-----	<0.50
BERYLLIUM-----	<3
CADMIUM-----	<3
CHROMIUM-----	9.1
COPPER-----	80.8
LEAD-----	12.7
MERCURY-----	<0.05
NICKEL-----	<5
SELENIUM-----	<0.50
SILVER-----	<10
THALLIUM-----	<25
ZINC-----	20.7
CYANIDE-----	14

RESPECTFULLY SUBMITTED,

SOUTHEAST LABORATORIES, INC.

RANDY BROWN

RB:DB



- SINCE 1971

1490 Mecaslin Sr., N.W. Atlanta, Ga. 30309 (404) 873-1896 (404) 873-1880

SEPTEMBER 10, 1987

MR. ASHLEY BROWN
WESTON SPER
100 ATLANTA TECHNOLOGY CENTER
SUITE 120, BLDG. 100
1575 NORTHSIDE DRIVE, N. W.
ATLANTA, GEORGIA 30318

RE: QUALITY CONTROL - METALS.

DEAR MR. BROWN:

SAMPLE 25083-1 WAS SPIKED WITH THE FOLLOWING METALS HAVING
THE RESPECTIVE RECOVERY:

<u>METAL</u>	<u>PERCENT</u>
ARSENIC-----	43
BERYLLIUM-----	87
CADMIUM-----	94
CHROMIUM-----	99
COPPER-----	96
LEAD-----	93
MERCURY-----	42
NICKEL-----	92
SELENIUM-----	76
THALLIUM-----	90
ZINC-----	101

RESPECTFULLY SUBMITTED,

SOUTHEAST LABORATORIES, INC.

Randy Brown
RANDY BROWN

RB:MS



- SINCE 1971

1490 Westside Dr. N.W. Atlanta, Ga 30309 404 373-1896 404 373-1897

SEPTEMBER 10, 1987

LABORATORY REPORT

WESTON SPER
100 ATLANTA TECHNOLOGY CENTER
SUITE 120, BLDG. 100
1575 NORTHSIDE DRIVE, N. W.
ATLANTA, GEORGIA 30318
ATTN: MR. ASHLEY BROWN

REPORT NO. 25083-1

SAMPLE MARKING: SPSC 01-02,03,04,05, 8-24-87 0950.

TEST PROCEDURE: HALOGENATED AND AROMATIC VOLATILE ORGANICS BY EPA
METHODS 8010 AND 8020 AS SET FORTH IN TEST METHODS FOR EVALUATING
SOLID WASTE SW-846, 2ND EDITION REVISED 1985.

RESULTS

<u>MICROGRAM/KILOGRAM</u> (PPB)		<u>MICROGRAM/KILOGRAM</u> (PPB)	
BROMODICHLOROMETHANE	<5	METHYLENE CHLORIDE	13
BROMOFORM	<5	TETRACHLOROETHENE	<5
BROMOMETHANE	<5	1,1,1 TRICHLOROETHANE	<5
CARBON TETRACHLORIDE	<5	1,1,2 TRICHLOROETHANE	<5
CHLOROBENZENE	<5	TRICHLOROETHENE	<5
CHLOROETHANE	<5	TRICHLOROFLUOROMETHANE	<5
2-CHLOROETHYL VINYL ETHER	<5	VINYL CHLORIDE	<5
CHLOROFORM	<5		
CHLOROMETHANE	<5	BENZENE	179
DIBROMOCHLOROMETHANE	<5	TOLUENE	241
1,2 DICHLOROBENZENE	<5	ETHYLBENZENE	<50
1,3 DICHLOROBENZENE	<5	XYLENES	26,100
1,4 DICHLOROBENZENE	<5		
DICHLORODIFLUOROMETHANE	<5		
1,1 DICHLOROETHANE	<5		
1,2 DICHLOROETHANE	<5		
1,1 DICHLOROETHENE	<5		
T-1,2 DICHLOROETHENE	<5		
1,2 DICHLOROPROPANE	<5		
C-1,3 DICHLOROPROPENE	<5		
T-1,3 DICHLOROPROPENE	<5		
1,1,2,2 TETRACHLOROETHANE	<5		

RESPECTFULLY SUBMITTED,

SOUTHEAST LABORATORIES, INC.

Randy Brown
RANDY BROWN

RB:DB



- SINCE 1971

1490 Macoslin St. N.W. Atlanta Ga 30309 (404) 573-1996 (404) 573-1997

SEPTEMBER 10, 1987

WESTON SPER
100 ATLANTA TECHNOLOGY CENTER
SUITE 120, BLDG. 100
1575 NORTHSIDE DRIVE, N. W.
ATLANTA, GEORGIA 30318

LABORATORY REPORT

REPORT NO. 25083-2

ATTN: MR. ASHLEY BROWN

SAMPLE MARKING: SPSC 02-01,02,03,04,05, 8-24-87 1000.

TEST PROCEDURE: EPA METHOD 601 AND 602 AS SET FORTH IN TEST METHODS FOR ORGANIC CHEMICAL ANALYSIS OF MUNICIPAL AND INDUSTRIAL WASTE EPA 600/4-82-027 JULY 1982.

RESULTS

<u>MICROGRAM/LITER</u> (PPB)		<u>MICROGRAM/LITER</u> (PPB)	
BROMODICHLOROMETHANE	<5	METHYLENE CHLORIDE	9
BROMOFORM	<5	TETRACHLOROETHENE	<5
BROMOMETHANE	<5	1,1,1-TRICHLOROETHANE	<5
CARBON TETRACHLORIDE	<5	1,1,2-TRICHLOROETHANE	<5
CHLOROBENZENE	<5	TRICHLOROETHENE	<5
CHLOROETHANE	<5	TRICHLOROFLUOROMETHANE	<5
2-CHLOROETHYL VINYL ETHER	<5	VINYL CHLORIDE	<5
CHLOROFORM	<5		
CHLOROMETHANE	<5	BENZENE	<50
DIBROMOCHLOROMETHANE	<5	TOLUENE	4,690
1,2-DICHLOROBENZENE	<5	ETHYLBENZENE	<50
1,3-DICHLOROBENZENE	<5	XYLENES	88,300
1,4-DICHLOROBENZENE	<5		
DICHLOROFLUOROMETHANE	<5		
1,1-DICHLOROETHANE	<5		
1,2-DICHLOROETHANE	<5		
1,1-DICHLOROETHENE	<5		
T-1,2-DICHLOROETHENE	<5		
1,2-DICHLOROPROPANE	<5		
C-1,3-DICHLOROPROPENE	<5		
T-1,3-DICHLOROPROPENE	<5		
1,1,2,2-TETRACHLOROETHANE	<5		

RESPECTFULLY SUBMITTED,

SOUTHEAST LABORATORIES, INC.

Randy Brown
RANDY BROWN

RB:OB



- SINCE 1971

1490 Macoslin St. N.W. Atlanta, Ga. 30309 (404) 373-1396 (404) 371-1330

SEPTEMBER 10, 1987

LABORATORY REPORT

WESTON SPER
100 ATLANTA TECHNOLOGY CENTER
SUITE 120, BLDG. 100
1575 NORTHSIDE DRIVE, N. W.
ATLANTA, GEORGIA 30318

REPORT NO. 25083-3

ATTN: MR. ASHLEY BROWN

SAMPLE MARKING: SPIC 01-01,02,03,04, 8-24-87 1005.

TEST PROCEDURE: EPA METHOD 601 AND 602 AS SET FORTH IN TEST METHODS FOR ORGANIC CHEMICAL ANALYSIS OF MUNICIPAL AND INDUSTRIAL WASTE EPA 600/4-82-027 JULY 1982.

RESULTS

<u>MICROGRAM/LITER</u> (PPB)		<u>MICROGRAM/LITER</u> (PPB)	
BROMODICHLOROMETHANE	<5	METHYLENE CHLORIDE	<5
BROMOFORM	<5	TETRACHLOROETHENE	<5
BROMOMETHANE	<5	1,1,1-TRICHLOROETHANE	8,000
CARBON TETRACHLORIDE	<5	1,1,2-TRICHLOROETHANE	<5
CHLOROBENZENE	<5	TRICHLOROETHENE	<5
CHLOROETHANE	<5	TRICHLOROFLUOROMETHANE	<5
2-CHLOROETHYL VINYL ETHER	<5	VINYL CHLORIDE	<5
CHLOROFORM	<5		
CHLOROMETHANE	<5	BENZENE	<50
DIBROMOCHLOROMETHANE	<5	TOLUENE	2,520
1,2-DICHLOROBENZENE	<5	ETHYLBENZENE	460
1,3-DICHLOROBENZENE	<5	XYLENES	14,600
1,4-DICHLOROBENZENE	<5		
DICHLOROFLUOROMETHANE	<5		
1,1-DICHLOROETHANE	<5		
1,2-DICHLOROETHANE	<5		
1,1-DICHLOROETHENE	17		
T-1,2-DICHLOROETHENE	<5		
1,2-DICHLOROPROPANE	<5		
C-1,3-DICHLOROPROPENE	<5		
T-1,3-DICHLOROPROPENE	<5		
1,1,2,2-TETRACHLOROETHANE	<5		

RESPECTFULLY SUBMITTED,

SOUTHEAST LABORATORIES, INC.

Randy Brown
RANDY BROWN

RB:DB



- SINCE 1971

1490 Mecaslin St. N.W. Atlanta Ga 30309 (404) 873-1996 (404) 873-1997

SEPTEMBER 10, 1987

LABORATORY REPORT

WESTON SPER
100 ATLANTA TECHNOLOGY CENTER
SUITE 120, BLDG. 100
1575 NORTHSIDE DRIVE, N. W.
ATLANTA, GEORGIA 30318

REPORT NO. 25083-4

ATTN: MR. ASHLEY BROWN

SAMPLE MARKING: SPSA 01-GROUND, 8-24-87 1010.

TEST PROCEDURE: EPA METHOD 601 AND 602 AS SET FORTH IN TEST METHODS FOR ORGANIC CHEMICAL ANALYSIS OF MUNICIPAL AND INDUSTRIAL WASTE EPA 600/4-82-027 JULY 1982.

RESULTS

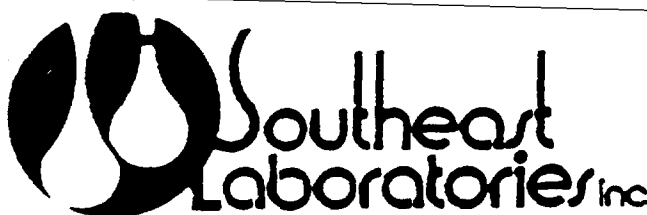
<u>MICROGRAM/LITER</u> (PPB)		<u>MICROGRAM/LITER</u> (PPB)	
BROMODICHLOROMETHANE	<5	METHYLENE CHLORIDE	<5
BROMOFORM	<5	TETRACHLOROETHENE	<5
BROMOMETHANE	<5	1,1,1-TRICHLOROETHANE	<5
CARBON TETRACHLORIDE	<5	1,1,2-TRICHLOROETHANE	<5
CHLOROBENZENE	<5	TRICHLOROETHENE	<5
CHLOROETHANE	<5	TRICHLOROFLUOROMETHANE	<5
2-CHLOROETHYL VINYL ETHER	<5	VINYL CHLORIDE	<5
CHLOROFORM	<5		
CHLOROMETHANE	<5	BENZENE	<50
DIBROMOCHLOROMETHANE	<5	TOLUENE	610
1,2-DICHLOROBENZENE	<5	ETHYLBENZENE	<50
1,3-DICHLOROBENZENE	<5	XYLENES	1,360
1,4-DICHLOROBENZENE	<5		
DICHLORODIFLUOROMETHANE	<5		
1,1-DICHLOROETHANE	<5		
1,2-DICHLOROETHANE	<5		
1,1-DICHLOROETHENE	<5		
T-1,2-DICHLOROETHENE	<5		
1,2-DICHLOROPROPANE	<5		
C-1,3-DICHLOROPROPENE	<5		
T-1,3-DICHLOROPROPENE	<5		
1,1,2,2-TETRACHLOROETHANE	<5		

RESPECTFULLY SUBMITTED,

SOUTHEAST LABORATORIES, INC.

Randy Brown
RANDY BROWN

RB:DB



- SINCE 1971

1490 Macosin St. N.W. Atlanta Ga 30309 (404) 573-1996 (404) 573-1990

SEPTEMBER 10, 1987

LABORATORY REPORT

WESTON SPER
100 ATLANTA TECHNOLOGY CENTER
SUITE 120, BLDG. 100
1575 NORTHSIDE DRIVE, N. W.
ATLANTA, GEORGIA 30318

REPORT NO. 25083-5

ATTN: MR. ASHLEY BROWN

SAMPLE MARKING: SPCS 01-GROUND, 8-24-87 1015.

TEST PROCEDURE: EPA METHOD 601 AND 602 AS SET FORTH IN TEST METHODS FOR
ORGANIC CHEMICAL ANALYSIS OF MUNICIPAL AND INDUSTRIAL WASTE EPA 600/4-82-
027 JULY 1982.

RESULTS

<u>MICROGRAM/LITER</u>		<u>MICROGRAM/LITER</u>	
(PPB)		(PPB)	
BROMODICHLOROMETHANE	<5	METHYLENE CHLORIDE	<5
BROMOFORM	<5	TETRACHLOROETHENE	<5
BROMOMETHANE	<5	1,1,1-TRICHLOROETHANE	<5
CARBON TETRACHLORIDE	<5	1,1,2-TRICHLOROETHANE	<5
CHLOROBENZENE	<5	TRICHLOROETHENE	<5
CHLOROETHANE	<5	TRICHLOROFLUOROMETHANE	<5
2-CHLOROETHYL VINYL ETHER	<5	VINYL CHLORIDE	<5
CHLOROFORM	<5		
CHLOROMETHANE	<5	BENZENE	<50
DIBROMOCHLOROMETHANE	<5	TOLUENE	<50
1,2-DICHLOROBENZENE	<5	ETHYLBENZENE	<50
1,3-DICHLOROBENZENE	<5	XYLENES	<50
1,4-DICHLOROBENZENE	<5		
DICHLOROFLUOROMETHANE	<5		
1,1-DICHLOROETHANE	<5		
1,2-DICHLOROETHANE	<5		
1,1-DICHLOROETHENE	<5		
T-1,2-DICHLOROETHENE	<5		
1,2-DICHLOROPROPANE	<5		
C-1,3-DICHLOROPROPENE	<5		
T-1,3-DICHLOROPROPENE	<5		
1,1,2,2-TETRACHLOROETHANE	<5		

RESPECTFULLY SUBMITTED,

SOUTHEAST LABORATORIES, INC.

Randy Brown
RANDY BROWN

RB:DB



- SINCE 1971

1490 Mecaslin St., N.W. Atlanta, Ga. 30309 (404) 873-1896 (404) 873-1880

SEPTEMBER 10, 1987

MR. ASHLEY BROWN
WESTON SPER
100 ATLANTA TECHNOLOGY CENTER
SUITE 120, BLDG. 100
1575 NORTHSIDE DRIVE, N. W.
ATLANTA, GEORGIA 30318

RE: QUALITY CONTROL - VOLATILE ORGANICS, OUR REPORT NO. 25083.

DEAR MR. BROWN:

BLANK WAS CARRIED THROUGH THE EXACT PROCEDURES AS WERE THE SAMPLES. THE FOLLOWING CONTAMINANTS WERE FOUND:

BROMODICHLOROMETHANE-----	1.8 PPB
METHYLENE CHLORIDE-----	1.4 PPB
TETRACHLOROETHENE-----	0.4 PPB

SPIKE SAMPLE:

THE SPIKE SAMPLE WAS TREATED EXACTLY AS THE SAMPLES WERE TREATED. SAMPLE 25083-2 WAS SPIKED WITH THE FOLLOWING VOLATILE ORGANICS:

1,1-DICHLOROETHENE-----	97% RECOVERY
TETRACHLOROETHENE-----	64% RECOVERY
ETHYL BENZENE-----	48% RECOVERY

RESPECTFULLY SUBMITTED,

SOUTHEAST LABORATORIES, INC.

Randy Brown
RANDY BROWN

RB:MS



POTENTIAL HAZARDOUS WASTE SITE
SITE INSPECTION REPORT
PART 1 - SITE LOCATION AND INSPECTION INFORMATION

I. IDENTIFICATION

01 STATE 02 SITE NUMBER
GA W0277

II. SITE NAME AND LOCATION

01 SITE NAME (Legal, common, or descriptive name of site)		02 STREET, ROUTE NO., OR SPECIFIC LOCATION IDENTIFIER	
SPECTRUM PRINTING		4132 U.S. HIGHWAY 27E	
03 CITY	04 STATE	05 ZIP CODE	06 COUNTY
COVINGTON	GA	30204	NEWTON
09 COORDINATES		10 TYPE OF OWNERSHIP (Check one)	
LATITUDE: 33 36 LS. LONGITUDE: 83 32 03.		<input type="checkbox"/> A. PRIVATE <input type="checkbox"/> B. FEDERAL <input type="checkbox"/> C. STATE <input type="checkbox"/> D. COUNTY <input type="checkbox"/> E. MUNICIPAL <input checked="" type="checkbox"/> F. OTHER TRUSTEESHIP <input type="checkbox"/> G. UNKNOWN	

III. INSPECTION INFORMATION

01 DATE OF INSPECTION	02 SITE STATUS	03 YEARS OF OPERATION
8 24 87	<input type="checkbox"/> ACTIVE <input checked="" type="checkbox"/> INACTIVE	BEGINNING YEAR: 1 ENDING YEAR: X UNKNOWN
04 AGENCY PERFORMING INSPECTION (Check all that apply)		
<input type="checkbox"/> A. EPA <input checked="" type="checkbox"/> B. EPA CONTRACTOR ROY F. WESTON <input type="checkbox"/> C. MUNICIPAL <input type="checkbox"/> D. MUNICIPAL CONTRACTOR <input type="checkbox"/> E. STATE <input type="checkbox"/> F. STATE CONTRACTOR <input type="checkbox"/> G. OTHER		

05 CHIEF INSPECTOR	06 TITLE	07 ORGANIZATION	08 TELEPHONE NO.
JOHN ASHLEY BROWN	CIVIL ENGINEER	ROY F. WESTON	(404) 352-4147
09 OTHER INSPECTORS	10 TITLE	11 ORGANIZATION	12 TELEPHONE NO.
W. KUTZ	EPA OSC	EPA	(404) 347-3931
			()
			()
			()
			()

13 SITE REPRESENTATIVES INTERVIEWED	14 TITLE	15 ADDRESS	16 TELEPHONE NO.
			()
			()
			()
			()
			()
			()
			()

17 ACCESS GAINED BY (Check one)	18 TIME OF INSPECTION	19 WEATHER CONDITIONS
<input checked="" type="checkbox"/> PERMISSION <input type="checkbox"/> WARRANT	0900	CLEAR, WARM

IV. INFORMATION AVAILABLE FROM

01 CONTACT	02 OF (Agency/Organization)	03 TELEPHONE NO.
RAMONA D. KLEIN	GEORGIA DEPT OF NATURAL RES.	(404) 656-2556
04 PERSON RESPONSIBLE FOR SITE INSPECTION FORM	05 AGENCY	06 ORGANIZATION
JOHN ASHLEY BROWN	EPA-TAT	ROY F. WESTON
		07 TELEPHONE NO.
		(404) 352-4147
		08 DATE
		8 24 87



POTENTIAL HAZARDOUS WASTE SITE
SITE INSPECTION
PART 4 - PERMIT AND DESCRIPTIVE INFORMATION

I. IDENTIFICATION

01 STATE 02 SITE NUMBER
64 W0277

II. PERMIT INFORMATION

01 TYPE OF PERMIT ISSUED <small>(Check all that apply)</small>	02 PERMIT NUMBER	03 DATE ISSUED	04 EXPIRATION DATE	05 COMMENTS
<input type="checkbox"/> A. NPDES				
<input type="checkbox"/> B. UIC				
<input type="checkbox"/> C. AIR				
<input type="checkbox"/> D. RCRA				
<input type="checkbox"/> E. RCRA INTERIM STATUS				
<input type="checkbox"/> F. SPCC PLAN				
<input type="checkbox"/> G. STATE <small>(Specify)</small>				
<input type="checkbox"/> H. LOCAL <small>(Specify)</small>				
<input type="checkbox"/> I. OTHER <small>(Specify)</small>				
<input type="checkbox"/> J. NONE				

III. SITE DESCRIPTION

01 STORAGE/ DISPOSAL <small>(Check all that apply)</small>	02 AMOUNT	03 UNIT OF MEASURE	04 TREATMENT <small>(Check all that apply)</small>	05 OTHER
<input type="checkbox"/> A. SURFACE IMPOUNDMENT			<input type="checkbox"/> A. INCENERATION	<input checked="" type="checkbox"/> A. BUILDINGS ON SITE
<input type="checkbox"/> B. PILES			<input type="checkbox"/> B. UNDERGROUND INJECTION	1
<input checked="" type="checkbox"/> C. DRUMS, ABOVE GROUND	APPROX 275	55 GAL	<input type="checkbox"/> C. CHEMICAL PHYSICAL	
<input type="checkbox"/> D. TANK, ABOVE GROUND			<input type="checkbox"/> D. BIOLOGICAL	
<input type="checkbox"/> E. TANK, BELOW GROUND			<input type="checkbox"/> E. WASTE OIL PROCESSING	
<input type="checkbox"/> F. LANDFILL			<input type="checkbox"/> F. SOLVENT RECOVERY	
<input type="checkbox"/> G. LANDFARM			<input type="checkbox"/> G. OTHER RECYCLING/RECOVERY	
<input type="checkbox"/> H. OPEN DUMP			<input type="checkbox"/> H. OTHER <small>(Specify)</small>	
<input type="checkbox"/> I. OTHER <small>(Specify)</small>				06 AREA OF SITE <small>(Specify)</small>
				APPROX 1.5

07 COMMENTS

IV. CONTAINMENT

01 CONTAINMENT OF WASTES (Check one)

☐ A. ADEQUATE, SECURE ☐ B. MODERATE ☐ C. INADEQUATE, POOR ☒ D. INSECURE, UNSOUND, DANGEROUS

02 DESCRIPTION OF DRUMS, DIKING, UNERS, BARRIERS, ETC.

V. ACCESSIBILITY

01 WASTE EASILY ACCESSIBLE: ☒ YES ☐ NO

02 COMMENTS

VI. SOURCES OF INFORMATION (Cite specific references, e.g., state files, sampling analysis, reports)



POTENTIAL HAZARDOUS WASTE SITE
SITE INSPECTION REPORT
PART 5 - WATER, DEMOGRAPHIC, AND ENVIRONMENTAL DATA

I. IDENTIFICATION

01 STATE 02 SITE NUMBER

GA WC277

VI. ENVIRONMENTAL INFORMATION

01 PERMEABILITY OF UNSATURATED ZONE (Check one)

☐ A. $10^{-9} - 10^{-8}$ cm/sec ☐ B. $10^{-8} - 10^{-6}$ cm/sec ☐ C. $10^{-6} - 10^{-3}$ cm/sec ☐ D. GREATER THAN 10^{-3} cm/sec

02 PERMEABILITY OF BEDROCK (Check one)

☐ A. IMPERMEABLE (Less than 10^{-6} cm/sec) ☐ B. RELATIVELY IMPERMEABLE ($10^{-6} - 10^{-8}$ cm/sec) ☐ C. RELATIVELY PERMEABLE ($10^{-8} - 10^{-4}$ cm/sec) ☐ D. VERY PERMEABLE (Greater than 10^{-4} cm/sec)

03 DEPTH TO BEDROCK

_____ (ft)

04 DEPTH OF CONTAMINATED SOIL ZONE

_____ (ft)

05 SOIL pH

06 NET PRECIPITATION

_____ (in)

07 ONE YEAR 24 HOUR RAINFALL

_____ (in)

08 SLOPE

SITE SLOPE

_____ %

DIRECTION OF SITE SLOPE

TERRAIN AVERAGE SLOPE

_____ %

09 FLOOD POTENTIAL

SITE IS IN _____ YEAR FLOODPLAIN

10

☐ SITE IS ON BARRIER ISLAND, COASTAL HIGH HAZARD AREA, RIVERINE FLOODWAY

11 DISTANCE TO WETLANDS (5 acre minimum)

ESTUARINE

OTHER

A. _____ (mi)

B. _____ (mi)

12 DISTANCE TO CRITICAL HABITAT (or endangered species)

_____ (mi)

ENDANGERED SPECIES: _____

13 LAND USE IN VICINITY

DISTANCE TO:

COMMERCIAL/INDUSTRIAL

RESIDENTIAL AREAS, NATIONAL STATE PARKS,
FORESTS, OR WILDLIFE RESERVES

AGRICULTURAL LANDS
PRIME AG LAND AG LAND

A. 40.1 (mi)

B. _____ (mi)

C. _____ (mi)

D. _____ (mi)

14 DESCRIPTION OF SITE IN RELATION TO SURROUNDING TOPOGRAPHY

TERRAIN IS SLIGHTLY HILLY. THE SITE IS LOCATED
ON THE PLATEAU OF A MEDIUM-SIZED HILL

VII. SOURCES OF INFORMATION (Cite specific references, e.g., state files, sample analysis reports)

USGS TOPO MAP



POTENTIAL HAZARDOUS WASTE SITE
SITE INSPECTION REPORT
PART 7 - OWNER INFORMATION

I. IDENTIFICATION
01 STATE 02 SITE NUMBER
GA WO 277

II. CURRENT OWNER(S)				PARENT COMPANY (if applicable)			
01 NAME RICHARD ELLENBERG (TRUSTEE)		02 D+B NUMBER		08 NAME		09 D+B NUMBER	
03 STREET ADDRESS (P.O. Box, RFD #, etc.) 83 WALTON ST NW		04 SIC CODE		10 STREET ADDRESS (P.O. Box, RFD #, etc.)		11 SIC CODE	
05 CITY ATLANTA		06 STATE GA	07 ZIP CODE 30316	12 CITY		13 STATE	14 ZIP CODE
01 NAME		02 D+B NUMBER		08 NAME		09 D+B NUMBER	
03 STREET ADDRESS (P.O. Box, RFD #, etc.)		04 SIC CODE		10 STREET ADDRESS (P.O. Box, RFD #, etc.)		11 SIC CODE	
05 CITY		06 STATE	07 ZIP CODE	12 CITY		13 STATE	14 ZIP CODE
01 NAME		02 D+B NUMBER		08 NAME		09 D+B NUMBER	
03 STREET ADDRESS (P.O. Box, RFD #, etc.)		04 SIC CODE		10 STREET ADDRESS (P.O. Box, RFD #, etc.)		11 SIC CODE	
05 CITY		06 STATE	07 ZIP CODE	12 CITY		13 STATE	14 ZIP CODE
01 NAME		02 D+B NUMBER		08 NAME		09 D+B NUMBER	
03 STREET ADDRESS (P.O. Box, RFD #, etc.)		04 SIC CODE		10 STREET ADDRESS (P.O. Box, RFD #, etc.)		11 SIC CODE	
05 CITY		06 STATE	07 ZIP CODE	12 CITY		13 STATE	14 ZIP CODE
III. PREVIOUS OWNER(S) (List most recent first)				IV. REALTY OWNER(S) (if applicable, list most recent first)			
01 NAME RALPH PREDDY		02 D+B NUMBER		01 NAME		02 D+B NUMBER	
03 STREET ADDRESS (P.O. Box, RFD #, etc.) UNKNOWN		04 SIC CODE		03 STREET ADDRESS (P.O. Box, RFD #, etc.)		04 SIC CODE	
05 CITY		06 STATE	07 ZIP CODE	05 CITY		06 STATE	07 ZIP CODE
01 NAME		02 D+B NUMBER		01 NAME		02 D+B NUMBER	
03 STREET ADDRESS (P.O. Box, RFD #, etc.)		04 SIC CODE		03 STREET ADDRESS (P.O. Box, RFD #, etc.)		04 SIC CODE	
05 CITY		06 STATE	07 ZIP CODE	05 CITY		06 STATE	07 ZIP CODE
01 NAME		02 D+B NUMBER		01 NAME		02 D+B NUMBER	
03 STREET ADDRESS (P.O. Box, RFD #, etc.)		04 SIC CODE		03 STREET ADDRESS (P.O. Box, RFD #, etc.)		04 SIC CODE	
05 CITY		06 STATE	07 ZIP CODE	05 CITY		06 STATE	07 ZIP CODE
V. SOURCES OF INFORMATION (Cite specific references e.g., state files, sample analysis results)							



POTENTIAL HAZARDOUS WASTE SITE
SITE INSPECTION REPORT
PART 9 - GENERATOR/TRANSPORTER INFORMATION

I. IDENTIFICATION

01 STATE 02 SITE NUMBER

64 60277

II. ON-SITE GENERATOR

01 NAME	02 D+B NUMBER
03 STREET ADDRESS (P.O. Box, RFD #, etc.)	04 SIC CODE
05 CITY	06 STATE 07 ZIP CODE

III. OFF-SITE GENERATOR(S)

01 NAME	02 D+B NUMBER	01 NAME	02 D+B NUMBER
03 STREET ADDRESS (P.O. Box, RFD #, etc.)	04 SIC CODE	03 STREET ADDRESS (P.O. Box, RFD #, etc.)	04 SIC CODE
05 CITY	06 STATE 07 ZIP CODE	05 CITY	06 STATE 07 ZIP CODE
01 NAME	02 D+B NUMBER	01 NAME	02 D+B NUMBER
03 STREET ADDRESS (P.O. Box, RFD #, etc.)	04 SIC CODE	03 STREET ADDRESS (P.O. Box, RFD #, etc.)	04 SIC CODE
05 CITY	06 STATE 07 ZIP CODE	05 CITY	06 STATE 07 ZIP CODE

IV. TRANSPORTER(S)

01 NAME	02 D+B NUMBER	01 NAME	02 D+B NUMBER
03 STREET ADDRESS (P.O. Box, RFD #, etc.)	04 SIC CODE	03 STREET ADDRESS (P.O. Box, RFD #, etc.)	04 SIC CODE
05 CITY	06 STATE 07 ZIP CODE	05 CITY	06 STATE 07 ZIP CODE
01 NAME	02 D+B NUMBER	01 NAME	02 D+B NUMBER
03 STREET ADDRESS (P.O. Box, RFD #, etc.)	04 SIC CODE	03 STREET ADDRESS (P.O. Box, RFD #, etc.)	04 SIC CODE
05 CITY	06 STATE 07 ZIP CODE	05 CITY	06 STATE 07 ZIP CODE

V. SOURCES OF INFORMATION (Get specific references to all state files, sample analysis reports)

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POTENTIAL HAZARDOUS WASTE SITE
SITE INSPECTION REPORT
PART 10 - PAST RESPONSE ACTIVITIES

I. IDENTIFICATION

01 STATE 02 SITE NUMBER
64 W0277

II. PAST RESPONSE ACTIVITIES (Continued)

01 ☐ R. BARRIER WALLS CONSTRUCTED
04 DESCRIPTION

02 DATE

03 AGENCY

01 ☐ S. CAPPING/COVERING
04 DESCRIPTION

02 DATE

03 AGENCY

01 ☐ T. BULK TANKAGE REPAIRED
04 DESCRIPTION

02 DATE

03 AGENCY

01 ☐ U. GROUT CURTAIN CONSTRUCTED
04 DESCRIPTION

02 DATE

03 AGENCY

01 ☐ V. BOTTOM SEALED
04 DESCRIPTION

02 DATE

03 AGENCY

01 ☐ W. GAS CONTROL
04 DESCRIPTION

02 DATE

03 AGENCY

01 ☐ X. FIRE CONTROL
04 DESCRIPTION

02 DATE

03 AGENCY

01 ☐ Y. LEACHATE TREATMENT
04 DESCRIPTION

02 DATE

03 AGENCY

01 ☐ Z. AREA EVACUATED
04 DESCRIPTION

02 DATE

03 AGENCY

01 ☐ 1. ACCESS TO SITE RESTRICTED
04 DESCRIPTION

02 DATE

03 AGENCY

01 ☐ 2. POPULATION RELOCATED
04 DESCRIPTION

02 DATE

03 AGENCY

01 ☒ 3. OTHER REMEDIAL ACTIVITIES
04 DESCRIPTION

02 DATE 8-24-87

03 AGENCY City of Council Bluffs

BARRIER TAPE PUT IN PLACE

III. SOURCES OF INFORMATION (Be specific: references, e.g., state files, sample analysis, reports)



POTENTIAL HAZARDOUS WASTE SITE
PRELIMINARY ASSESSMENT
PART 1 - SITE INFORMATION AND ASSESSMENT

IDENTIFICATION
01 STATE 02 SITE NUMBER
GA WC 297

II. SITE NAME AND LOCATION

01 SITE NAME (Legal, common, or descriptive name of site) SPECTRUM PRINTING		02 STREET, ROUTE NO., OR SPECIFIC LOCATION IDENTIFIER 4132 U.S. HIGHWAY 278			
03 CITY COVINGTON	04 STATE GA	05 ZIP CODE 30209	06 COUNTY NEWTON	07 COUNTY CODE	08 CONG DIST
09 COORDINATES LATITUDE 33 36.15		LONGITUDE 83 52.03			

10 DIRECTIONS TO SITE (Starting from nearest public road)

FROM ATLANTA TAKE INTERSTATE 20 EAST, APPROXIMATELY 35 MILES TO THE COVINGTON U.S. 278 EXIT. TAKE U.S. 278 EAST, APPROX 1 MILE TO WEST STREET GO LEFT APPROX 100 FEET, SITE IS ON THE RIGHT.

III. RESPONSIBLE PARTIES

01 OWNER (if known) RICHARD ELLENBURG (TRUSTEE)		02 STREET (Business, mailing, residential) 83 WALTON ST NW			
03 CITY ATLANTA	04 STATE GA	05 ZIP CODE 30318	06 TELEPHONE NUMBER 404 525 4000		
07 OPERATOR (if known and different from owner)		08 STREET (Business, mailing, residential)			
09 CITY	10 STATE	11 ZIP CODE	12 TELEPHONE NUMBER		

13 TYPE OF OWNERSHIP (Check one)

☐ A. PRIVATE ☐ B. FEDERAL ☐ C. STATE ☐ D. COUNTY ☐ E. MUNICIPAL
☒ F. OTHER: TRUSTEESHIP - RICHARD ELLENBURG (Specify)

14 OWNER/OPERATOR NOTIFICATION ON FILE (Check all that apply)

☐ A. RCRA 3001 DATE RECEIVED: MONTH DAY YEAR ☐ B. UNCONTROLLED WASTE SITE (RCRA 103(c)) DATE RECEIVED: MONTH DAY YEAR ☐ C. NONE

IV. CHARACTERIZATION OF POTENTIAL HAZARD

01 ON SITE INSPECTION		BY (Check all that apply)			
<input checked="" type="checkbox"/> YES	DATE 8 24 97	<input checked="" type="checkbox"/> A. EPA	<input checked="" type="checkbox"/> B. EPA CONTRACTOR	<input checked="" type="checkbox"/> C. STATE	<input type="checkbox"/> D. OTHER CONTRACTOR
<input type="checkbox"/> NO		<input type="checkbox"/> E. LOCAL HEALTH OFFICIAL	<input type="checkbox"/> F. OTHER: (Specify)		
CONTRACTOR NAME(S): ROY F. WESTON					

02 SITE STATUS (Check one)	03 YEARS OF OPERATION
<input type="checkbox"/> A. ACTIVE <input checked="" type="checkbox"/> B. INACTIVE <input type="checkbox"/> C. UNKNOWN	BEGINNING YEAR ENDING YEAR <input checked="" type="checkbox"/> UNKNOWN

04 DESCRIPTION OF SUBSTANCES POSSIBLY PRESENT, KNOWN OR ALLEGED

CHROMIUM, LEAD, XYLENES, AMY DROPS ISOPROPYL ALCOHOL

05 DESCRIPTION OF POTENTIAL HAZARD TO ENVIRONMENT AND/OR POPULATION

PRINTING WASTES WERE OBSERVED ON THE GROUND AND ON THE PAVED AREA WHERE DRUMS ARE STAGED

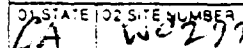
V. PRIORITY ASSESSMENT

01 PRIORITY FOR INSPECTION (Check one. If high or medium is checked, complete Part 2 - Waste Information and Part 3 - Description of Hazardous Conditions and Incidents.)

☐ A. HIGH (Inspection required promptly) ☒ B. MEDIUM (Inspection required) ☐ C. LOW (Inspect on time available basis) ☐ D. NONE (No further action needed, complete current disposition form)

VI. INFORMATION AVAILABLE FROM

01 CONTACT RACHA J. KLEIN	02 OF (Agency, Organization) GA DEPT OF NATURAL RESOURCES	03 TELEPHONE NUMBER (404) 656 2836
04 PERSON RESPONSIBLE FOR ASSESSMENT JOHN ADLEY BROWN	05 AGENCY EPA-TAT	06 ORGANIZATION ROY F. WESTON
	07 TELEPHONE NUMBER (404) 332 4147	08 DATE 9 27 97





POTENTIAL HAZARDOUS WASTE SITE
PRELIMINARY ASSESSMENT
PART 3 - DESCRIPTION OF HAZARDOUS CONDITIONS AND INCIDENTS

I. IDENTIFICATION
01 STATE: GA 02 SITE NUMBER: WL 277

II. HAZARDOUS CONDITIONS AND INCIDENTS

01 ☒ A. GROUNDWATER CONTAMINATION: SOUTH OF 02 ☐ OBSERVED (DATE: 8-24-97) ☒ POTENTIAL ☐ ALLEGED
03 POPULATION POTENTIALLY AFFECTED: COVINGTON 04 NARRATIVE DESCRIPTION

RAIN RUNOFF FROM OPEN DRUMS AND SPILLED MATERIAL ON SITE MOST LIKELY
WILL RUN INTO DRIED INDIAN CREEK WHICH IS A DRAINAGE PATH WHICH TRAVELS
SOUTH AND DRIES UP DURING PERIODS OF LITTLE RAIN

01 ☐ B. SURFACE WATER CONTAMINATION: SOUTH OF 02 ☐ OBSERVED (DATE: 8-24-97) ☒ POTENTIAL ☐ ALLEGED
03 POPULATION POTENTIALLY AFFECTED: COVINGTON 04 NARRATIVE DESCRIPTION

RAIN RUNOFF FROM OPEN DRUMS AND SPILLED MATERIAL ON SITE WILL
MOST LIKELY MAKE ITS WAY TO DRIED INDIAN CREEK

01 ☒ C. CONTAMINATION OF AIR: COVINGTON 02 ☐ OBSERVED (DATE: 8-24-97) ☒ POTENTIAL ☐ ALLEGED
03 POPULATION POTENTIALLY AFFECTED: COVINGTON 04 NARRATIVE DESCRIPTION

EVAPORATION OF SOLVENTS (CARRIERS) IN OPEN DRUMS

01 ☐ D. FIRE/EXPLOSIVE CONDITIONS 02 ☐ OBSERVED (DATE:) ☐ POTENTIAL ☐ ALLEGED
03 POPULATION POTENTIALLY AFFECTED: 04 NARRATIVE DESCRIPTION

01 ☒ E. DIRECT CONTACT 02 ☐ OBSERVED (DATE: 8-24-97) ☒ POTENTIAL ☐ ALLEGED
03 POPULATION POTENTIALLY AFFECTED: 04 NARRATIVE DESCRIPTION

MATERIAL IN OPEN DRUMS IS EASILY ACCESSIBLE TO PUBLIC

01 ☒ F. CONTAMINATION OF SOIL: COLL 02 ☐ OBSERVED (DATE: 8-24-97) ☐ POTENTIAL ☒ ALLEGED
03 AREA POTENTIALLY AFFECTED: (ACRES) 04 NARRATIVE DESCRIPTION

SPILLAGE OF MATERIAL ON THE GROUND WAS OBSERVED BENEATH
THE TERMINUS OF A PIPE GOING INTO THE BUILDING

01 ☐ G. DRINKING WATER CONTAMINATION 02 ☐ OBSERVED (DATE:) ☐ POTENTIAL ☐ ALLEGED
03 POPULATION POTENTIALLY AFFECTED: 04 NARRATIVE DESCRIPTION

01 ☒ H. WORKER EXPOSURE/INJURY 02 ☐ OBSERVED (DATE: 8-24-97) ☒ POTENTIAL ☐ ALLEGED
03 WORKERS POTENTIALLY AFFECTED: 04 NARRATIVE DESCRIPTION

IN THE EVENT OF A CLEANUP CARE SHOULD BE EXERCISED AS MANY OF
THE PALLETS DRUMS ARE STACKED ON A PEAR CURED

01 ☐ I. POPULATION EXPOSURE/INJURY 02 ☐ OBSERVED (DATE:) ☐ POTENTIAL ☐ ALLEGED
03 POPULATION POTENTIALLY AFFECTED: 04 NARRATIVE DESCRIPTION



POTENTIAL HAZARDOUS WASTE SITE
PRELIMINARY ASSESSMENT
PART 3 - DESCRIPTION OF HAZARDOUS CONDITIONS AND INCIDENTS

I. IDENTIFICATION

01 STATE 02 SITE NUMBER

GA W02-97

II. HAZARDOUS CONDITIONS AND INCIDENTS (Continued)

01 ☐ J. DAMAGE TO FLORA
04 NARRATIVE DESCRIPTION

02 ☐ OBSERVED (DATE: _____)

☐ POTENTIAL

☐ ALLEGED

01 ☐ K. DAMAGE TO FAUNA
04 NARRATIVE DESCRIPTION (include name(s) of species)

02 ☐ OBSERVED (DATE: _____)

☐ POTENTIAL

☐ ALLEGED

01 ☐ L. CONTAMINATION OF FOOD CHAIN
04 NARRATIVE DESCRIPTION

02 ☐ OBSERVED (DATE: _____)

☐ POTENTIAL

☐ ALLEGED

01 ☒ M. UNSTABLE CONTAINMENT OF WASTES
(Spills, runoff, standing liquids, leaking drums)

02 ☐ OBSERVED (DATE: 8-24-97)

☐ POTENTIAL

☒ ALLEGED

03 POPULATION POTENTIALLY AFFECTED: COVINGTON

04 NARRATIVE DESCRIPTION

MANY DRUMS ARE OPEN AND FILLED TO THE TOP WITH RAIN WATER, SOME DRUMS ARE OVERTURNED AND LEAKING MATERIAL

01 ☐ N. DAMAGE TO OFFSITE PROPERTY
04 NARRATIVE DESCRIPTION

02 ☐ OBSERVED (DATE: _____)

☐ POTENTIAL

☐ ALLEGED

01 ☒ O. CONTAMINATION OF SEWERS, STORM DRAINS, WWTPs
04 NARRATIVE DESCRIPTION

02 ☐ OBSERVED (DATE: 8-24-97)

☐ POTENTIAL

☒ ALLEGED

RAIN RUNOFF FROM SITE WILL BE CARRIED BY STORM DRAINS

01 ☐ P. ILLEGAL/UNAUTHORIZED DUMPING
04 NARRATIVE DESCRIPTION

02 ☐ OBSERVED (DATE: _____)

☐ POTENTIAL

☐ ALLEGED

05 DESCRIPTION OF ANY OTHER KNOWN, POTENTIAL, OR ALLEGED HAZARDS

III. TOTAL POPULATION POTENTIALLY AFFECTED: _____

IV. COMMENTS

V. SOURCES OF INFORMATION (Give specific references, e.g., state files, sample analysis, reports)

RAMONA J. KLEIN - STATE DP, GP NAV RESOURCES, COVINGTON NEWS - FORMER OWNER PRIOR TO PRP'S ACQUISITION, RANDY BROWN - SOUTHEASTERN LABS, RANDY BROWN - SOUTHEASTERN LABS, Denny STRICKLAND - CITY OF COVINGTON WATER WORKS, DON FLOYD - FILL & MAINTENANCE - COVINGTON, FRANK TURNER - COVINGTON CITY MANAGER



PHOTO# 6
OFFICIAL PHOTOGRAPH
ENVIRONMENTAL PROTECTION AGENCY

Subject: SAMPLES COLLECTED, SPECTRUM PRINTING SITE

Location: 4132 US HWY 278 COVINGTON GEORGIA

Date: AUGUST 24, 1987

Photographer: J. LATHRAM

Film: WOLF **ASA:** 100

TDD#: 04-8708-03

Time: 10:20 AM

Witness: J.A. BROWN

Location of Negative: TAT OFFICE



PHOTO# 5
OFFICIAL PHOTOGRAPH
ENVIRONMENTAL PROTECTION AGENCY

Subject: SPILLED MATERIAL, SPECTRUM PRINTING SITE

Location: 4132 US HWY 278 COVINGTON GEORGIA

Date: AUGUST 24, 1987

Time: 09:35 AM

Photographer: J.A. BROWN

Witness: J.C. LAN

Film: WOLF **ASA:** 100

Location of Negative: TAT OFFICE

TDD#: 04-8708-03



PHOTO# 4
OFFICIAL PHOTOGRAPH
ENVIRONMENTAL PROTECTION AGENCY

Subject: SPILLED MATERIAL, SPECTRUM PRINTING SITE

Location: 4132 US HWY 278 COVINGTON GEORGIA

Date: AUGUST 24, 1987

Time: 10:20 AM

Photographer: J.A. BROWN

Witness: J.C. LAN

Film: WOLF **ASA:** 100

Location of Negative: TAT OFFICE

TDD#: 04-8708-03



PHOTO# 3
OFFICIAL PHOTOGRAPH
ENVIRONMENTAL PROTECTION AGENCY

Subject: SPILLED MATERIAL, SPECTRUM PRINTING SITE

Location: 4132 US HWY 278 COVINGTON GEORGIA

Date: AUGUST 24, 1987

Time: 10:20 AM

Photographer: J.A. BROWN

Witness: J.C. LAN

Film: WOLF **ASA:** 100

Location of Negative: TAT OFFICE

TDD#: 04-8708-03



PHOTO# 2
OFFICIAL PHOTOGRAPH
ENVIRONMENTAL PROTECTION AGENCY

Subject: SAMPLING OPERATIONS, SPECTRUM PRINTING SITE

Location: 4132 US HWY 278 COVINGTON GEORGIA

Date: AUGUST 24, 1987

Time: 09:40 AM

Photographer: J. LATHRAM

Witness: KLUTZ

Film: WOLF **ASA:** 100

Location of Negative: TAT OFFICE

TDD#: 04-8708-03



PHOTO# 1
OFFICIAL PHOTOGRAPH
ENVIRONMENTAL PROTECTION AGENCY

Subject: DRUM STAGING AREA, SPECTRUM PRINTING SITE 4132 US HWY 278

Location: LOOKING SOUTHWEST ACROSS OLD ATLANTA RD., COVINGTON GEORGIA

Date: AUGUST 24, 1987

Time: 09:30 AM

Photographer: J.A. BROWN

Witness: J.C. LAN

Film: WOLF **ASA:** 100

Location of Negative: TAT OFFICE

TDD#: 04-8708-03

Yellow

AGREEMENT

I. Parties and Jurisdiction

This Agreement is entered into by and between Richard D. Ellenburg, in his capacity as Trustee in Bankruptcy for Spectrum Printing Company, Inc. (hereafter "the Trustee"), and the United States Environmental Protection Agency (hereafter "EPA"), pursuant to the authority vested in the President of the United States by Section 104, Section 106(a), and Section 122(a) of the Comprehensive Environmental Response, Compensation and Liability Act of 1980 (hereafter "CERCLA"), 42 U.S.C. Section 9604, Section 9606(a), and Section 9622(1), as amended by the Superfund Amendments and Reauthorization Act of 1986 (hereafter called "SARA"), P.L. 99-499 (CERCLA, as amended, may sometimes be hereafter referred to simply as "CERCLA"). SARA portions of the above-cited sections were delegated by the President to the Administrator of EPA by Executive Order 12580, dated January 23, 1987, 52 Fed. Reg. 2923 (Jan. 29, 1987), and were redelegated by interim delegations of the Administrator of EPA to Regional Administrators and Assistant Administrators in EPA Delegation Nos. 14-8-B and 14-14-C, dated February 26, 1987. The Trustee consents to and will not contest EPA jurisdiction or authority to enter into this Agreement.

This Agreement concerns the proposed removal of hazardous substances from the printing facility formerly operated by Spectrum Printing, Company, Inc. in Covington, Georgia (hereafter "the Site").

II. EPA Determinations

For the purposes of this Agreement, EPA has determined that:

A. The release and threat of release of hazardous substances from the Site may present an imminent and substantial endangerment to the public health or welfare or the environment;

B. In order to protect public health and welfare and the environment, it is necessary that action be taken to mitigate the release and threat of release of hazardous substances from the Site into the environment; and

C. The actions undertaken to be performed by the Trustee under this Agreement are consistent with the National Contingency Plan, 40 CFR Part 300, as amended.

III. Work To Be Performed

It is hereby agreed that the following activities will be performed:

A. An Immediate Removal Plan has been submitted on behalf of the Trustee and is incorporated herein by reference as Exhibit A.

B. A comprehensive Site Safety Plan is to be submitted on behalf of the Trustee within Fourteen (14) days of the effective date of this Agreement. Within Seven (7) days of receipt of the Site Safety Plan, EPA shall notify the Trustee in writing of EPA's approval or disapproval of the Site Safety Plan or any part thereof. In the event of any disapproval, EPA shall specify in writing both the

deficiencies and any EPA recommended modifications.

C. Within seven (7) days of the receipt of EPA notification of Site Safety Plan disapproval, the Trustee shall amend and submit to EPA a revised plan. In the event of subsequent disapproval of the plan, EPA retains the right to undertake removal or other action pursuant to its authority under CERCLA.

D. Within five (5) days of EPA approval of the Site Safety Plan, the Trustee shall begin implementation of the tasks detailed in the approved Immediate Removal Plan and Site Safety Plan. The Trustee shall complete implementation within Ninety (90) days of the execution of this Agreement.

E. All actions carried out by the Trustee pursuant to this Agreement shall be done under the oversight of EPA through its On-Scene Coordinator.

F. The Trustee shall assure access to the Site by EPA and its employees, contractors and consultants for the purposes of overseeing and monitoring the implementation of this Agreement.

G. The Trustee shall notify EPA Seven (7) days in advance of each action to be taken at the Site pursuant to this Agreement.

H. All actions carried out by the Trustee pursuant to this Agreement shall be done in accordance with all applicable federal, state, and local laws.

I. Upon request, the Trustee will provide EPA with split samples of any samples collected in connection with the performance of this Agreement.

J. All response work performed pursuant to this Agreement shall be under the direction and supervision of a qualified professional engineer or other qualified professional with expertise and experience in hazardous waste site cleanup. The Trustee shall notify EPA as to such engineer or other qualified professional and of any contractors and subcontractors to be used in carrying out the terms of this Agreement promptly following the execution of this Agreement or in advance of their involvement at the Site, whichever is the later.

K. The Trustee shall use quality assurance/quality control, and chain-of-custody procedures in accordance with EPA Region IV Environmental Services Division, Standard Operating Procedures and Quality Assurance Manual, April 1, 1986, throughout all activities. The Trustee shall consult with EPA in planning for sampling and analysis. The Trustee shall provide a quality control report to EPA certifying that all activities have been performed as approved.

L. The Trustee shall preserve all records developed pursuant to the implementation of this Agreement for a period of at least Six (6) years following completion of all work performed pursuant to this Agreement.

M. Any reports, plans, specifications, schedules and attachments required by this Agreement are, upon approval by EPA, incorporated into this Agreement.

N. All submittals and notifications to EPA pursuant to this Agreement shall be made to:

Bill Klutz
On-Scene Coordinator
Superfund Branch
Waste Management Division
U.S. EPA - Region IV
345 Courtland Street, N.E.
Atlanta, Georgia 30365
404/347-3931

O. The Trustee shall provide adequate documentation of the proper disposal of all hazardous substances, by providing the On-Scene Coordinator with shipment manifests and corresponding inventories.

IV. Reservation of Rights

Nothing in this Agreement will constitute or be construed as a release from any claim, cause or action or demand in law or equity against any person, firm, partnership, or corporation for any liability it may have arising out of or relating in any way to the generation, storage, treatment, handling, transportation, release, or disposal of any hazardous substances, hazardous waste, pollutants, or contaminants found at, taken to, or taken from the Site.

This Agreement does not constitute any decision on preauthorization of funds under Section 111(a)(2) of CERCLA.

In entering into this Agreement, the Trustee waives any right to seek reimbursement under Section 106(b)(2) of CERCLA, 42 U.S.C. Section 9606(b)(2), for any past costs associated with this Site, or any costs incurred in complying with this Agreement.

EPA reserves the right to take any enforcement action pursuant to CERCLA or any other available legal authority, including

the right to seek injunctive relief, monetary penalties, and punitive damages for any violation of law or this Agreement.

V. Notification of the State

Pursuant to Section 106(a) of CERCLA, 42 U.S.C. Section 9606(a), the State of Georgia has been notified of this Agreement by EPA. .

VI. Effective Date and Completion

The effective date of this Agreement shall be the date on which it is signed on behalf of EPA or the date on which it is approved by the Bankruptcy Court, whichever is later.

The provisions of this Agreement will be deemed fulfilled upon the Trustee's receipt of written notice from EPA that the Trustee has demonstrated to the satisfaction of EPA that all the terms of this Agreement have been completed. Such written notice shall not be unreasonably withheld.

IT IS SO AGREED:

BY: _____
Richard Ellenberg, as Trustee for
Spectrum Printing
Date _____

BY: _____
U.S. Environmental Protection Agency
Date _____

This agreement entered into among the Environmental Protection Agency and the Trustee is hereby approved by the Bankruptcy Court.

This _____ day of _____, 1988.

Bracken
4/27/88

ASBELL

4/27/88

BOILEN

4/28/88

KLUTZ

4/28/88

Rogers

JOURDAN

5/2/88

STONEBRAKER

5/3/88

TOBIN

5-3-88

Yellow Copy

EXHIBIT 1

IMMEDIATE REMOVAL PLANS

1. Within ten days from approval of the Agreement by the Trustee, the EPA, and the Bankruptcy Court, the Trustee's contractor will mobilize a chemist and two technicians to the site to spend one to two days to sample, and perform hazard categorization and staging. The contractor currently understands that there are sixty 5-gallon ink pails, three 55-gallon drums of isopropyl alcohol, and one hundred eighty-five 55-gallon drums (most of which are open and appear to contain water). Additionally, two areas of contaminated dirt (estimated to contain approximately ten 55-gallon drums) will be excavated. Sludge under the presses will be cleaned up and disposed of.

2. During this initial staging, the Trustee's Contractor will composite five different waste streams consisting of water, inks, isopropyl alcohol, adhesives, and contaminated dirts and sludges. As needed, the waste streams will be analyzed in order to obtain disposal approval.

3. When the sample results are returned and disposal approval is gained, the Trustee's contractor will remobilize one chemist, two technicians, and an operator to bulk and dispose of the materials. Should the water be classified as non-hazardous, the Trustee's contractor will, on behalf of the Trustee, obtain permits to discharge to sewers. Inks will be returned to the

manufacturer. Flammable liquids will be tendered to M&J Solvents in Atlanta. The adhesives and dirt (if tested as hazardous) will be tendered to the Chemical Waste Management Landfill in Emelle, Alabama.

4. Other trash, pallets, and empty drums will be tendered to a sanitary landfill. This "cleaning" portion of the job, as set forth in paragraphs 3 and 4 herein, is estimated to take approximately seven days. The Trustee's contractor will be using a vacuum unit, forklift, and backhoe.

5. At each stage of the proceeding, the Trustee's contractor will offer to the Agency duplicate copies of the results of analyses performed. The Trustee's contractor has represented to the Trustee that necessary permits and arrangements will be made in accordance with applicable environmental laws.

6. All work performed pursuant to this Immediate Removal Plan shall be under the direction and supervision of qualified personnel with expertise and experience in hazardous waste site clean up.

COST CENTER 04		ACKNOWLEDGEMENT OF COMPLETION PERFORMANCE OBSERVATION REPORT: PART I		04-8810-26-2026	
CONTRACT NO: 68-01-7367		CONTRACTOR: ROY F. WESTON, INC.		TDD NO. 04881026A	
REPORTING ELEMENT: TAT004		DATE(S) OF REPORTED OBSERVATION 10/01/88 TO 06/01/89		APPROX. NO. OF HOURS 160	
PERFORMANCE EVALUATION CATEGORY: 11 REMOVALS (FUNDED) CERCLA 104C				<input type="checkbox"/> FORMAL REPORT <input checked="" type="checkbox"/> LETTER REPORT <input type="checkbox"/> FORMAL BRIEFING <input type="checkbox"/> OTHER (SPECIFY)	
DESCRIPTION OF CONTRACTOR OBSERVATION BY: NAME/TITLE CONLEY B. PHIFER					
TAT WAS TASK WITH PROVIDING REMOVAL SUPPORT, GENERAL TECHNICAL ASSISTANCE, AND PRP MONITORING INVOLVING PRINTING WASTES AT THE SPECTRUM PRINTING FACILITY LOCATED IN COVINGTON, NEWTON CO., GA. TAT ASSISTED THE PRP CONTRACTOR IN THE DEVELOPMENT OF A COMPREHENSIVE SITE SAFETY PLAN, PROVIDED EXPERTISE IN SAMPLING PROTOCOL, AND DOCUMENTED ALL ASPECTS OF THE REMOVAL. TAT MADE NUMEROUS SUGGESTIONS TO THE PRP WHICH WERE (SEE ATTACHMENT)					
RATING: 5,4,3,2,1 3		SIGNATURE OF CONTRACTOR: <i>Conley B Phifer</i>		DATE: 6/12/89	
DESCRIPTION OF EPA OBSERVATION BY: NAME/TITLE					
RATING: 5,4,3,2,1		SIGNATURE OF EPA:		DATE:	
SIGNATURE OF REGIONAL POR COORDINATOR:				DATE:	
HQ COORDINATOR'S EVALUATION BY: NAME/TITLE					
RATING: 5,4,3,2,1		SIGNATURE OF HQ:		DATE:	
DPO ACTION: <input type="checkbox"/> ACCEPTED <input type="checkbox"/> ACCEPTED WITH EXCEPTIONS <input type="checkbox"/> REJECTED					
COST TO DATE:		DATE: 06/01/89		ACTUAL TOTAL HOURS: 173	
TOTAL COST TO CLOSURE:					
I CERTIFY THAT THE ATTACHED MATERIALS MEET AND COMPLY WITH ALL REQUIREMENTS OF THE SUBJECT TDD.				DATE: 6/12/89 INTERIM	
<i>Conley B Phifer</i> TATL SIGNATURE (INTERIM)				TATL SIGNATURE (FINAL)	
I ACKNOWLEDGE THAT I HAVE BEEN PROVIDED WITH THE MATERIALS AND SERVICES SPECIFIED IN THE SUBJECT TDD WITHIN ITS ORIGINAL OR REVISED TIME FRAMES.				DATE: 6/16/89 INTERIM	
<i>Carol J. Marshall</i> DPO SIGNATURE (INTERIM)				DPO SIGNATURE (FINAL)	

WHITE - HQ/TRANS COORDINATOR
 WHITE - DPO COPY
 BLUE - TATL COPY
 GREEN - ZPM COPY
 CANARY - PROJECT OFFICER COPY
 PINK - CONTRACTING OFFICER COPY
 GOLDENROD - DPO (INTERIM COPY)

TDD #04-8810-26-2026
#04-8810-26A-2213

(ATTACHMENT)

SPECTRUM PRINTING
COVINGTON, NEWTON CO., GA

SUBSEQUENTLY RESPONSIBLE FOR INCREASING THE OVERALL TIMELINESS AND EFFECTIVENESS OF THE ACTION. TAT MAINTAINED CONSTANT CONTACT WITH THE OSC APPRISING HIM OF REMOVAL PROGRESS AND PROBLEMS ENCOUNTERED. A DETAILED REPORT IS CURRENTLY BEING COMPILED TO DOCUMENT PRP ACTIONS AT THIS SITE.

**TAT CPAF CONTRACT PERFORMANCE OBSERVATION REPORT (POR)
PART II. EVALUATION CRITERIA RATING WORKSHEET**

CONTRACT NO: 68-01- 7367	CONTRACTOR: Roy F. Weston	TOD NO: 04881026, A
REPORTING ELEMENT: <i>Region IV</i>	DATE(S) OF REPORTED OBSERVATION <i>10/1/88 to 6/1/89</i>	APPROX. NO. OF HOURS <i>173</i>
PERFORMANCE EVALUATION CATEGORY: <div style="text-align: center;"><i>Remarks</i></div>		
CONTRACTOR REPRESENTATIVE		EPA PERFORMANCE MONITOR <i>Klutz</i>

PERFORMANCE CRITERIA	RATING	SUPPORTING COMMENTS
PROJECT PLANNING - ORGANIZING (E.G., WORK PLAN DEVELOPMENT, DATA REVIEW) - SCHEDULING - BUDGETING <i>Bill, Please fill in</i>	_____ 5 _____ 4 _____ 3 _____ 2 _____ 1	
TECHNICAL COMPETENCE & INNOVATION - EFFECTIVENESS OF ANALYSIS - MEET PLAN GOALS - ADHERE TO REGS. & PROCEDURES - APPROACH CREATIVITY/INGENUITY	_____ 5 _____ 4 _____ 3 _____ 2 _____ 1	
SCHEDULE & COST CONTROL - BUDGET (HOURS & COST) MAINTENANCE - PRIORITY SCHEDULE ADJUSTMENTS - COST MINIMIZATION	_____ 5 _____ 4 _____ 3 _____ 2 _____ 1	
REPORTING - TIMELINESS OF DELIVERABLES - CLARITY - THOROUGHNESS	_____ 5 _____ 4 _____ 3 _____ 2 _____ 1	
RESOURCE UTILIZATION - STAFFING - SUBCONTRACTING - EQUIPMENT, TRAVEL, ETC.	_____ 5 _____ 4 _____ 3 _____ 2 _____ 1	<i>Report was 2 1/2 months late.</i>
EFFORT - RESPONSIVENESS - MOBILIZATION - DAY TO DAY - SPECIAL SITUATIONS (IF G., ADVERSE/ DANGEROUS CONDITIONS)	_____ 5 _____ 4 _____ 3 _____ 2 _____ 1	



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IV

345 COURTLAND STREET, N.E.
ATLANTA, GEORGIA 30365

ENFORCEMENT CONFIDENTIAL

MEMORANDUM

DATE: FEB 5 1990

SUBJECT: Decision not to Take Cost Recovery Action Regarding
Spectrum Printing Company, Inc. Removal Site
(EPA ID #9N)

A. Site Description

The Site in question was formerly operated as a printing facility by Spectrum Printing Co., Inc. In October 1987, EPA was notified of the proposed sale of the Site in connection with the company's bankruptcy proceeding under Chapter 7. In response, the Department of Justice, acting on behalf of EPA, notified the company that EPA had obtained information that there had been a release of hazardous substances at the Site and that EPA was evaluating whether EPA would take action at the Site pursuant to Section 104 of CERCLA. Subsequently, in 1988, EPA entered into an "Agreement," under which the company has performed the needed removal activities. The removal has been completed.

B. Work Authorized and Conducted and Associated Costs

When EPA was first notified of this Site, the materials stored outside the building were sampled using the Emergency Response and Control Section's Technical Assistance Team (TAT) contractor. Sample results revealed the presence of solvents in waste ink. After the Agreement was executed, the TAT contractor was again used to perform on-site monitoring to insure that the company's contractor complied with the Agreement and any applicable rules and regulations.

EPA's expenditures were as follows:

Contracts	\$3,713.37
Payroll	650.54
Indirect	<u>1,668.00</u>
	\$6,031.91

C. Discussion of Basis Not To Pursue Cost Recovery

The basis for the decision not to pursue cost recovery for this Site includes the following facts:

1. The principal reason not to pursue cost recovery for this Site is the insolvency of the company which owned and operated the Site.

Even though the company had filed for bankruptcy under Chapter 7 of the Bankruptcy Code, we were able to obtain the agreement of the bankruptcy trustee to conduct the needed removal activities. The work was done under an "Agreement" entered into under Sections 104, 106(a) and 122(a) of CERCLA, which incorporated an approved Immediate Removal Work Plan. In view of our lack of authority to issue an order to the bankrupt compelling the work to be done, the Agreement was somewhat less formal than an Administrative Order, and it did not include a provision for the payment of oversight costs.

The bankruptcy action remains pending according to the attorney for the trustee. In this situation, our sole recourse would have been the filing of a proof of claim in the bankruptcy, and the bar date for such a filing has passed and likely had already passed when the Agreement was executed. Consequently, these oversight costs should be considered not recoverable due to the bankruptcy of the responsible party.

2. Aside from the insolvency of the corporate owner, other factors support the decision not to pursue cost recovery. While we did not explicitly waive payment of oversight costs in the Agreement, we did not request them and should not pursue them after the fact, particularly in light of the cooperation of the company's representatives in agreeing to conduct the work needed. In addition, the automatic stay in bankruptcy would preclude our taking formal action outside of the bankruptcy court to recover our costs.

D. Conclusion

In light of the insolvency and pending bankruptcy of the corporate owner and operator and the cooperation of the bankruptcy trustee in conducting the removal, cost recovery action for EPA's costs of \$6,031.91 should not be pursued.

Reviewer: 

Project Manager, Cost Recovery Section

Concurrences:

 2/1/90
Office of Regional Counsel

 2/1/90
Chief, South Cost Recovery Unit

^{- 3}
Michael J. Hurlbutt for B. Spagg 2/1/90
Chief, Cost Recovery Section

[Signature] 2/2/91
Chief, Waste Programs Branch

Patrick M. Tomi 2-5-90
Director, Waste Management Division

Yellow

AGREEMENT

I. Parties and Jurisdiction

This Agreement is entered into by and between Richard D. Ellenburg, in his capacity as Trustee in Bankruptcy for Spectrum Printing Company, Inc. (hereafter "the Trustee"), and the United States Environmental Protection Agency (hereafter "EPA"), pursuant to the authority vested in the President of the United States by Section 104, Section 106(a), and Section 122(a) of the Comprehensive Environmental Response, Compensation and Liability Act of 1980 (hereafter "CERCLA"), 42 U.S.C. Section 9604, Section 9606(a), and Section 9622(1), as amended by the Superfund Amendments and Reauthorization Act of 1986 (hereafter called "SARA"), P.L. 99-499 (CERCLA, as amended, may sometimes be hereafter referred to simply as "CERCLA"). SARA portions of the above-cited sections were delegated by the President to the Administrator of EPA by Executive Order 12580, dated January 23, 1987, 52 Fed. Reg. 2923 (Jan. 29, 1987), and were redelegated by interim delegations of the Administrator of EPA to Regional Administrators and Assistant Administrators in EPA Delegation Nos. 14-8-B and 14-14-C, dated February 26, 1987. The Trustee consents to and will not contest EPA jurisdiction or authority to enter into this Agreement.

This Agreement concerns the proposed removal of hazardous substances from the printing facility formerly operated by Spectrum Printing, Company, Inc. in Covington, Georgia (hereafter "the Site").

II. EPA Determinations

For the purposes of this Agreement, EPA has determined that:

A. The release and threat of release of hazardous substances from the Site may present an imminent and substantial endangerment to the public health or welfare or the environment;

B. In order to protect public health and welfare and the environment, it is necessary that action be taken to mitigate the release and threat of release of hazardous substances from the Site into the environment; and

C. The actions undertaken to be performed by the Trustee under this Agreement are consistent with the National Contingency Plan, 40 CFR Part 300, as amended.

III. Work To Be Performed

It is hereby agreed that the following activities will be performed:

A. An Immediate Removal Plan has been submitted on behalf of the Trustee and is incorporated herein by reference as Exhibit A.

B. A comprehensive Site Safety Plan is to be submitted on behalf of the Trustee within Fourteen (14) days of the effective date of this Agreement. Within Seven (7) days of receipt of the Site Safety Plan, EPA shall notify the Trustee in writing of EPA's approval or disapproval of the Site Safety Plan or any part thereof. In the event of any disapproval, EPA shall specify in writing both the

deficiencies and any EPA recommended modifications.

C. Within seven (7) days of the receipt of EPA notification of Site Safety Plan disapproval, the Trustee shall amend and submit to EPA a revised plan. In the event of subsequent disapproval of the plan, EPA retains the right to undertake removal or other action pursuant to its authority under CERCLA.

D. Within five (5) days of EPA approval of the Site Safety Plan, the Trustee shall begin implementation of the tasks detailed in the approved Immediate Removal Plan and Site Safety Plan. The Trustee shall complete implementation within Ninety (90) days of the execution of this Agreement.

E. All actions carried out by the Trustee pursuant to this Agreement shall be done under the oversight of EPA through its On-Scene Coordinator.

F. The Trustee shall assure access to the Site by EPA and its employees, contractors and consultants for the purposes of overseeing and monitoring the implementation of this Agreement.

G. The Trustee shall notify EPA Seven (7) days in advance of each action to be taken at the Site pursuant to this Agreement.

H. All actions carried out by the Trustee pursuant to this Agreement shall be done in accordance with all applicable federal, state, and local laws.

I. Upon request, the Trustee will provide EPA with split samples of any samples collected in connection with the performance of this Agreement.

J. All response work performed pursuant to this Agreement shall be under the direction and supervision of a qualified professional engineer or other qualified professional with expertise and experience in hazardous waste site cleanup. The Trustee shall notify EPA as to such engineer or other qualified professional and of any contractors and subcontractors to be used in carrying out the terms of this Agreement promptly following the execution of this Agreement or in advance of their involvement at the Site, whichever is the later.

K. The Trustee shall use quality assurance/quality control, and chain-of-custody procedures in accordance with EPA Region IV Environmental Services Division, Standard Operating Procedures and Quality Assurance Manual, April 1, 1986, throughout all activities. The Trustee shall consult with EPA in planning for sampling and analysis. The Trustee shall provide a quality control report to EPA certifying that all activities have been performed as approved.

L. The Trustee shall preserve all records developed pursuant to the implementation of this Agreement for a period of at least Six (6) years following completion of all work performed pursuant to this Agreement.

M. Any reports, plans, specifications, schedules and attachments required by this Agreement are, upon approval by EPA, incorporated into this Agreement.

N. All submittals and notifications to EPA pursuant to this Agreement shall be made to:

Bill Klutz
On-Scene Coordinator
Superfund Branch
Waste Management Division
U.S. EPA - Region IV
345 Courtland Street, N.E.
Atlanta, Georgia 30365
404/347-3931

O. The Trustee shall provide adequate documentation of the proper disposal of all hazardous substances, by providing the On-Scene Coordinator with shipment manifests and corresponding inventories.

IV. Reservation of Rights

Nothing in this Agreement will constitute or be construed as a release from any claim, cause or action or demand in law or equity against any person, firm, partnership, or corporation for any liability it may have arising out of or relating in any way to the generation, storage, treatment, handling, transportation, release, or disposal of any hazardous substances, hazardous waste, pollutants, or contaminants found at, taken to, or taken from the Site.

This Agreement does not constitute any decision on preauthorization of funds under Section 111(a)(2) of CERCLA.

In entering into this Agreement, the Trustee waives any right to seek reimbursement under Section 106(b)(2) of CERCLA, 42 U.S.C. Section 9606(b)(2), for any past costs associated with this Site, or any costs incurred in complying with this Agreement.

EPA reserves the right to take any enforcement action pursuant to CERCLA or any other available legal authority, including

the right to seek injunctive relief, monetary penalties, and punitive damages for any violation of law or this Agreement.

V. Notification of the State

Pursuant to Section 106(a) of CERCLA, 42 U.S.C. Section 9606(a), the State of Georgia has been notified of this Agreement by EPA. .

VI. Effective Date and Completion

The effective date of this Agreement shall be the date on which it is signed on behalf of EPA or the date on which it is approved by the Bankruptcy Court, whichever is later.

The provisions of this Agreement will be deemed fulfilled upon the Trustee's receipt of written notice from EPA that the Trustee has demonstrated to the satisfaction of EPA that all the terms of this Agreement have been completed. Such written notice shall not be unreasonably withheld.

IT IS SO AGREED:

BY: Richard Ellenberg, as Trustee for
Spectrum Printing

Date _____

BY: U.S. Environmental Protection Agency

Date _____

This agreement entered into among the Environmental Protection Agency and the Trustee is hereby approved by the Bankruptcy Court.

This _____ day of _____, 1988.

Barker
4/27/88

ASBELL

4/27/88

BOILEN

4/28/88

KLUTZ

4/28/88

Rogers

JOURDAN

5/3/88

STONEBRAKER

5/3/88

TOBIN

5-3-88

Yellow Copy

EXHIBIT 1

IMMEDIATE REMOVAL PLANS

1. Within ten days from approval of the Agreement by the Trustee, the EPA, and the Bankruptcy Court, the Trustee's contractor will mobilize a chemist and two technicians to the site to spend one to two days to sample, and perform hazard categorization and staging. The contractor currently understands that there are sixty 5-gallon ink pails, three 55-gallon drums of isopropyl alcohol, and one hundred eighty-five 55-gallon drums (most of which are open and appear to contain water). Additionally, two areas of contaminated dirt (estimated to contain approximately ten 55-gallon drums) will be excavated. Sludge under the presses will be cleaned up and disposed of.

2. During this initial staging, the Trustee's Contractor will composite five different waste streams consisting of water, inks, isopropyl alcohol, adhesives, and contaminated dirts and sludges. As needed, the waste streams will be analyzed in order to obtain disposal approval.

3. When the sample results are returned and disposal approval is gained, the Trustee's contractor will remobilize one chemist, two technicians, and an operator to bulk and dispose of the materials. Should the water be classified as non-hazardous, the Trustee's contractor will, on behalf of the Trustee, obtain permits to discharge to sewers. Inks will be returned to the

manufacturer. Flammable liquids will be tendered to M&J Solvents in Atlanta. The adhesives and dirt (if tested as hazardous) will be tendered to the Chemical Waste Management Landfill in Emelle, Alabama.

4. Other trash, pallets, and empty drums will be tendered to a sanitary landfill. This "cleaning" portion of the job, as set forth in paragraphs 3 and 4 herein, is estimated to take approximately seven days. The Trustee's contractor will be using a vacuum unit, forklift, and backhoe.

5. At each stage of the proceeding, the Trustee's contractor will offer to the Agency duplicate copies of the results of analyses performed. The Trustee's contractor has represented to the Trustee that necessary permits and arrangements will be made in accordance with applicable environmental laws.

6. All work performed pursuant to this Immediate Removal Plan shall be under the direction and supervision of qualified personnel with expertise and experience in hazardous waste site clean up.

HANSELL & POST

A PARTNERSHIP INCLUDING PROFESSIONAL CORPORATIONS

THIRTY-THIRD FLOOR FIRST ATLANTA TOWER
ATLANTA, GEORGIA 30383-3101
TELEPHONE 404 581-8000
TELECOPIER 404 581-8330
TELEX 54-2711

56 PERIMETER CENTER EAST, N.E.
FIFTH FLOOR
ATLANTA, GEORGIA 30346-2283

1667 K STREET, N.W.
SUITE 500
WASHINGTON, D.C. 20006-1692

July 19, 1988

Mr. William Klutz
Hazardous Waste Law Branch
United States Environmental
Protection Agency
Region IV
345 Courtland Street, N.E.
Atlanta, Georgia 30365

RE: Spectrum Printing Site

Dear Bill:

Enclosed please find a copy of the Notice received from the United States Bankruptcy Court setting a hearing on the Motion to Approve the Trustee's entering into a Contract with the Environmental Protection Agency. You will note that the hearing is set for August 16, 1988. Also, as stated in the Notice, objections to the Motion must be filed with the Clerk of the Court not later than five working days prior to the hearing. At this time, we are unaware of any objections having been filed.

Sincerely,



Gregory R. Hanthorn

GRH/dr

Enclosure.

cc: Truly F. Bracken, Esquire

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION

IN RE
SPECTRUM PRINTING CO., INC.,
Debtor.

:
:
:
:
:

CASE NO. A87-04856-ADK

NOTICE

Notice is hereby given that Trustee has filed a motion to enter into a contract with the Environmental Protection Agency to cause removal of certain hazardous waste from the property of the Estate and to hire the contractors necessary to perform such work. Trustee has requested that approval of the contract be conditioned upon the Estate and Trustee not being subject to liability for breach of the contract and Trustee being authorized to delegate any and all duties under the contract.

Trustee has also filed a motion to obtain secured financing to fund the work called for under said Agreements. The secured financing motion proposes that the holder of a deed to secure debt on the property in question, The First National Bank of Atlanta, provide the funding to be secured by the same collateral and priority held by that lender as of the filing of the petition in this case.

Copies of all such motions are filed with the Clerk of the Court and available for inspection.

Notice is hereby given that a hearing shall be held upon said Motions before the Court on the 16th day of Aug., 1988 at 10:00 o'clock A.M. in Room 1706, United States Bankruptcy Court, 75 Spring Street, S.W., Atlanta, Georgia 30303. Notice is further given that any objections to said Motions must be filed with the Clerk of this Court not later than five (5) working days prior to the said hearing with a copy served upon counsel for Trustee.

SO ORDERED this 14 day of July, 1988.

A. D. KAHN
A. D. KAHN
United States Bankruptcy Judge

Prepared by:
James S. Altman
James S. Altman
83 Walton Street, N.W.
Atlanta, Georgia 30303
(404) 525-4000



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IV

345 COURTLAND STREET
ATLANTA, GEORGIA 30365

Ms. Cindy Love
Haztech Inc.
5280 Panola Industrial Blvd.
Decatur Ga. 30065

Dear Cindy:

In reference to our conversation of December 14, 1988 regarding the hazardous waste classification of the organic material at the Spectrum Printing site in Covington, Georgia. Subsequent to an indeterminate finding by Region IV RCRA, and review of the data, the organic/pigmented waste at the site is not representative of a K086 classification. However, due to the presence of organic solvents in EPA's composite sampling and the large quantity of organic solvents present at the site, the pigmented organic compounds appear to belong to the F003, F005 and/or the D001 listings where applicable. Both F class waste codes are appropriate for nonhalogenated solvent waste from nonspecific sources. D001 could also apply, since most solvent waste have a flashpoint of less than 140 degrees Fahrenheit.

If you have any questions or want to discuss this further please give me a call at 404/347-3931.

Sincerely

Bill Klutz



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IV

345 COURTLAND STREET
ATLANTA, GEORGIA 30365

*copy to Spectrum
File*

Ms. Cindy Love
Haztech Inc.
5280 Panola Industrial Blvd.
Decatur Ga. 30065

Dear Cindy:

In reference to our conversation of December 14, 1988 regarding the hazardous waste classification of the organic material at the Spectrum Printing site in Covington, Georgia. Subsequent to an indeterminate finding by Region IV RCRA, and review of the data, the organic/pigmented waste at the site is not representative of a K086 classification. However, due to the presence of organic solvents in EPA's composite sampling and the large quantity of organic solvents present at the site, the pigmented organic compounds appear to belong to the F003, F005 and/or the D001 listings where applicable. Both F class waste codes are appropriate for nonhalogenated solvent waste from nonspecific sources. D001 could also apply, since most solvent waste have a flashpoint of less than 140 degrees Fahrenheit.

If you have any questions or want to discuss this further please give me a call at 404/347-3931.

Sincerely

Bill Klutz

Mr. Gregory R. Hanthorn
Hansell & Post
First Atlanta Tower
Atlanta, Georgia 30383-3101

Re: Spectrum Printing Company, Inc. Site

Dear Mr. Hanthorn:

We have received the manifests documenting the shipment of wastes from the Spectrum Printing Company, Inc. site, together with the data from sampling conducted at the site. Based upon these documents and other information previously provided to EPA and its Technical Assistance Team contractor, you are hereby notified that the terms of the Removal Agreement regarding this site have been satisfactorily completed.

We appreciate your continued cooperation in seeing this removal action through to completion.

Sincerely,

Truly F. Bracken
Assistant Regional Counsel
Hazardous Waste Law Branch

bcc: Bill Klutz

TBRACKEN/5-5-89



**Westinghouse
Environmental Services**

Westinghouse HAZTECH, Inc.

5280 Panola Industrial Boulevard
Decatur, Georgia 30035
(404) 981-9332
(404) 981-9339 (24 Hr.)
FAX (404) 981-1786

June 5, 1989

Mr. Richard Ellenberg, Trustee
c/o Mr. Gregory R. Hanthorn
Hansell and Post
First Atlanta Tower, 33rd Floor
Atlanta, Georgia 30383-3101

RE: Spectrum Printing
Project Documents
Project Number 2322-88-1240

Dear Mr. Ellenberg:

Please find attached the original, completed manifest for the five final drums of waste shipped from Spectrum to Rineco. As per 40 CFR Part 268.7 (a)(6) this documentation must be kept on file for five years from the final date of waste shipment.

Sincerely,

Westinghouse Environmental
and Geotechnical Services, Inc.

Cindy Love
Cynthia Love
Project Manager

cc: Mr. Bob Handler
First National Bank of Atlanta
Mail Code 212, 2 Peachtree Street
Atlanta, GA 30349

Mr. Bill Klutz
Environmental Protection Agency
345 Courtland Street, N.E.
Atlanta, GA 30365



Please print or type. (Form designed for use on elite (12-pitch) typewriter.)

Form Approved. OMB No. 2050-0039. Expires 9-30-91

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator's US EPA ID No.	Manifest Document No.	2. Page 1	Information in the shaded areas is not required by Federal law.
		G A D 9 8 1 1 2 2 6 3 3 5 9	13 12 16 10	1 of 1	
3. Generator's Name and Mailing Address Spectrum Printing 5280 Panola Industrial Blvd., Decatur, GA 30035		A. State Manifest Document Number AR-393260			
4. Generator's Phone (404) 981-9332					
5. Transporter 1 Company Name EASE Transportation, Inc.		6. US EPA ID Number G A D 9 8 1 1 2 3 3 0 0 0		C. State Facility ID 104456-8996	
7. Transporter 2 Company Name		8. US EPA ID Number		E. State Facility ID	
9. Designated Facility Name and Site Address Rineco Chemical Industrial 1007 Vulcan Road. Benton, AR. 72015		10. US EPA ID Number A R D 9 8 1 1 0 5 7 8 7 0		G. State Facility ID H. Facility's Phone 501 748-9089	
11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)		12. Containers		13. Total Quantity	14. Unit Wt/Vol
a. RQ Waste Combustible Liquid, n.o.s., NA 1993 (Combustible Liquid) F003, F005		No. Type			
b.					
c.					
d.					
15. Special Handling Instructions and Additional Information In case of emergency, call 1-800-424-9300					
16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations and Arkansas state regulations. If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.					
Printed/Typed Name Richard D. Ellenberg Trustee of Spectrum Printing		Signature Richard D. Ellenberg		Month Day Year 4/14/89	
17. Transporter 1 Acknowledgement of Receipt of Materials		Signature Terry Kogler		Month Day Year 4/14/89	
18. Transporter 2 Acknowledgement of Receipt of Materials		Signature		Month Day Year	
19. Discrepancy Indication Space					
20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.					
Printed/Typed Name James D Roberts		Signature James D Roberts		Month Day Year 4/14/89	

EPA Form 8700-22 (Rev. 9-88) Previous edition is obsolete.

NOTICE: THE ORIGINAL AND NOT LESS THAN TWO (2) COPIES MUST MOVE WITH THE HAZARDOUS WASTE SHIPMENT. ONCE DELIVERED, THE TREATMENT/STORAGE/DISPOSAL FACILITY MUST RETURN THIS ORIGINAL COPY TO THE GENERATOR.

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

DATE: NOV 27 1988

SUBJECT: Identification of RCRA Hazardous Wastes at
Spectrum Printing Company in Covington, Georgia

FROM: Craig Brown *CB*
RCRA Branch

TO: Bill Klutz
Superfund Branch

A hazardous waste removal contractor has been retained to clean up the Spectrum Printing site located in Covington, Georgia. One of the clean-up/removal alternatives under consideration is consolidation and stabilization of some 300 containers of waste with subsequent disposal in a solid waste landfill. Unless it can be reasonably ascertained that there are no RCRA listed hazardous wastes present at this site EPA should not approve any plan which involves wholesale consolidation and stabilization of wastes, particularly if the treated waste is to be disposed of in a solid waste landfill.

It is my understanding that waste characterization carried out during the site investigation was limited to obtaining a physical description of the wastes and testing several composite samples for specific constituents. Although this type of information is useful in sorting waste containers into compatible groups to facilitate safe handling it has little practical value in terms of identifying RCRA hazardous wastes.

Characteristic hazardous wastes can be easily identified by testing representative waste samples for ignitability, corrositivity, E P toxicity, and reactivity as specified in 40 CFR Part 261 and Test Methods for Solid Waste (SW-846). Identifying listed hazardous wastes that may be present at the site would be more difficult since RCRA waste listings are source specific and/or chemical specific. However, print shops which use certain solvents for cleaning presses and other equipment would be expected to generate spent solvents (F001-F005). Additionally, print shops which formulate or mix their own lead or chrome based inks would be expected to generate wash water and sludge from cleaning the mixing equipment (K086). It could reasonably be assumed that inks were formulated onsite if the facility is equipped with mixing vessels or grinding mills.

The best way to determine what if any listed hazardous wastes may be present at the Spectrum Printing site would be to interview the former owner or employees. If this is not possible an indication of the types of waste present at the Spectrum site can be provided from waste audits of print shops similar to the Spectrum Printing Company. However, even if waste composition data were available, direct comparison of samples of waste from Spectrum to wastes generated by active print shops may not be conclusive given that some of the containers at Spectrum were left uncovered, outdoors for months. Finally, if there are drums of unused chemicals inside the building at the Spectrum site the labels on the drums may be checked against the list of commercial chemical products in 40 CFR §261.33, which are hazardous wastes when discarded.